

3. Plaintiff HIPH is a Michigan limited liability company located at 4645 Eagle Drive in Jackson MI, 49201.

4. Defendant HaeNaem is a Korean company located at 194, Jisan-ro 175beon-gil, Jinwi-myeon Pyeongtaek-si KR-41 Gyeonggido 17718 KR.

Jurisdiction and Venue

5. This Court has original subject matter jurisdiction over patent, copyright, and federal trademark and trade dress claims pursuant to 28 U.S.C. § 1331 and 1338(a).

6. This Court has personal jurisdiction over HaeNaem because, on information and belief, HaeNaem has entered into one or more distribution agreements for the benefit of HaeNaem's reaching the United States market. Through these established distribution channels, it was foreseeable that HaeNaem's products would arrive in Michigan.

7. This Court has personal jurisdiction over HaeNaem because, on information and belief, HaeNaem has had continuous, systematic, and substantial contacts within the State of Michigan, including doing business in Michigan and directing sales and advertising efforts through the Internet into the State of Michigan, and sending infringing articles to purchasers into the State of Michigan, directly and/or through established networks of distributors. HaeNaem's website, directions for use, and YouTube technique videos are all accessible in Michigan.

8. Alternatively, this Court has personal jurisdiction pursuant to Rule 4(k)(2) because HaeNaem lacks substantial contacts with any single state but has sufficient contacts with the United States as a whole to satisfy due process standards and justify the application of federal law.

9. Venue is proper in this district under 28 U.S.C. § 1391(c) because HaeNaem is not incorporated in any State in the United States.

Plaintiffs' Valuable Intellectual Property

10. Dr. Salah Huwais is the founder of Osseodensification. He maintains a private practice in Jackson, Michigan focusing on periodontics and surgical implantology. Dr. Huwais earned his dental degree from the University of Aleppo, School of Dentistry, in Aleppo, Syria and completed his periodontics and implantology surgical training at the University of Illinois at Chicago. He serves as an Adjunct Clinical Assistant Professor at the University of Minnesota, Dental Implant Program. Dr. Huwais lectures nationally and internationally on periodontal and surgical implantology procedures. He is Diplomate of the American Board of Periodontology and the American Board of Oral Implantology.

11. While placing implants over his many years of practice, Dr. Huwais consistently experienced the limitations of excavating bone using conventional drills when preparing osteotomies. He thought that the traditional pre-implant osteotomy was unnecessarily traumatic to the jawbone. He saw patients who

suffered from the traditional osteotomy procedure and so he began looking for a new and less traumatic way to prepare the jawbone for dental implants. His goal was to maintain healthy bone rather than excavate it as traditional osteotomies did. In this way, he believed that healthy bone would be better able to maintain the foundational strength of the bone and thus support the dental implant.

12. Versah was founded in April of 2014 by Dr. Huwais to provide dental implant clinicians with an improved and unique way to prepare osteotomies to receive dental implants. The osteotomy is the hole formed in bone, here, the jaw bone, to prepare it to accept a screw-in dental implant.

13. “Osseodensification,” a term coined by Versah, is the surgical procedure accomplished using the proprietary instruments invented by Dr. Huwais and marketed by Versah as the Densah® Bur Kit.

14. Contrary to drilling away bone, the Densah® Burs are rotated in reverse at 800 to 1500 rpms and, when coupled with irrigation, densify bone through compaction autografting or Osseodensification. Stated another way, while others in the periodontics field were all drilling holes in bone – effectively injuring it – Dr. Huwais rethought the entire procedure and arrived at a revolutionary way to preserve healthy dental bone while preparing the osteotomy for a dental implant.

15. The Densah[®] Bur consistently produces a strong and dense layer of bone tissue along the walls and base of the osteotomy. Dense compacted bone tissue produces stronger grip for a dental implant and may facilitate faster healing and earlier loading.

16. Dr. Huwais's proprietary osseodensification process was nothing less than a revolution in the dental implant field. In just eight short years, the osseodensification technique pioneered by Dr. Huwais has become the standard of practice for dental practitioners the world over.

17. In connection with Dr. Huwais's innovation, HIPH is the owner of various intellectual property rights, including patents as well as the registered trademark on which counts of this action are based. HIPH has granted an exclusive license in this intellectual property to BRRTech, LLC ("BRRTech").

18. BRRTech in turn has granted a limited exclusive license for the dental field of use to Versah.

19. The license to Versah granted the right to Versah to bring suit against third parties for infringement of the licensed intellectual property.

20. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 10,039,621 ("the '621 Patent"). [Exhibit 1].

21. The '621 Patent, titled "Autografting Osteotome," was issued by the United States Patent and Trademark Office on August 7, 2018. The '621 Patent

issued from U.S. Patent Application No. 14/443,626. The ‘621 patent has a priority date of November 19, 2012, based on provisional application no. 61/727,849. A true and correct copy of the ‘621 Patent is attached hereto as Ex. 1.

22. Versah is an exclusive licensee of the ‘621 Patent for the dental field of use.

23. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 9,022,783 (“the ‘783 Patent”). [Ex. 2].

24. The ‘783 Patent, titled “Fluted Osteotome and Surgical Method for Use” was issued by the United States Patent and Trademark Office on May 5, 2015. The ‘783 Patent issued from U.S. Patent Application No. 13/427,391. The ‘783 Patent has a priority date of March 23, 2011 based on provisional application no. 61/466,579. A true and correct copy of the ‘783 Patent is attached hereto as Ex. 2.

25. Versah is an exclusive licensee of the ‘783 Patent for the dental field of use.

26. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 9,028,253 (“the ‘253 Patent”). [Ex. 3].

27. The ‘253 Patent, titled “Fluted Osteotome and Surgical Method for Use” was issued by the United States Patent and Trademark Office on May 12, 2015. The ‘253 Patent issued from U.S. Patent Application No. 13/608,307. The

‘253 Patent is a Continuation-in-part of application No. 13/427,391, filed on March 22, 2012 and claims priority to Provisional application No. 61/466,579, filed on March 23, 2011. A true and correct copy of the ‘253 Patent is attached hereto as Ex. 3.

28. Versah is an exclusive licensee of the ‘253 Patent for the dental field of use.

29. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 9,526,593 (“the ‘593 Patent”). [Ex. 4].

30. The ‘593 Patent, titled “Fluted Osteotome and Surgical Method for Use” was issued by the United States Patent and Trademark Office on December 27, 2016. The ‘593 Patent issued from U.S. Patent Application No. 14/704,340. The ‘593 Patent is a Continuation of the ‘783 Patent, and claims priority to Provisional application No. 61/466,579, filed on March 23, 2011. A true and correct copy of the ‘593 Patent is attached hereto as Ex. 4.

31. Versah is an exclusive licensee of the ‘593 Patent for the dental field of use.

32. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 9,737,312 (“the ‘312 Patent”). [Ex. 5].

33. The ‘312 Patent, titled “Fluted Osteotome and Surgical Method for Use” was issued by the United States Patent and Trademark Office on August 22,

2017. The ‘312 Patent issued from U.S. Patent Application No. 14/705,535. The ‘312 Patent is a Continuation of the ‘253 Patent, and claims priority to Provisional application No. 61/466,579, filed on March 23, 2011. A true and correct copy of the ‘312 Patent is attached hereto as Ex. 5.

34. Versah is an exclusive licensee of the ‘312 Patent for the dental field of use.

35. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 10,980,548 (“the ‘548 Patent”). [Ex. 6].

36. The ‘548 Patent, titled “Autografting Tool With Enhanced Flute Profile and Methods of Use” was issued by the United States Patent and Trademark Office on April 20, 2021. The ‘548 Patent issued from U.S. Patent Application No. 16/069,967. The ‘548 Patent claims priority to Provisional application No. 62/278,579 , filed on Jan. 14 , 2016. A true and correct copy of the ‘548 Patent is attached hereto as Ex. 6.

37. Versah is an exclusive licensee of the ‘548 Patent for the dental field of use.

38. HIPH is the owner and assignee of all right, title, and interest in and to U.S. Patent No. 10,568,639 (“the ‘639 Patent”). [Ex. 7]. Collectively, the ‘783, ‘253, ‘593, ‘312, ‘621, ‘548, and ‘639 Patents will be referred to as the “Asserted Patents.”

39. The ‘639 Patent, titled “Fluted Osteotome and Surgical Method for Use” was issued by the United States Patent and Trademark Office on February 25, 2020. The ‘639 Patent issued from U.S. Patent Application No. 15/648,556. The ‘639 Patent is a Continuation of the ‘312 Patent and claims priority to Provisional application No. 61/466,579, filed on Mar. 23, 2011. A true and correct copy of the ‘639 Patent is attached hereto as Ex. 7.

40. Versah is an exclusive licensee of the ‘639 Patent for the dental field of use.

41. Versah virtually marks its Densah® Bur Kits by reference to the www.versah.com/patents website, directing to the <https://versah.com/versah-patents-worldwide/> website, where the Asserted Patents are listed.

Defendants’ Infringement

42. With Versah’s successful, innovative products, came copycats and counterfeiters.

43. HaeNaem manufactures its HaeNaem Bur Kit and Total HaeNaem Bur Kit, which it sells and offers for sale into the United States.



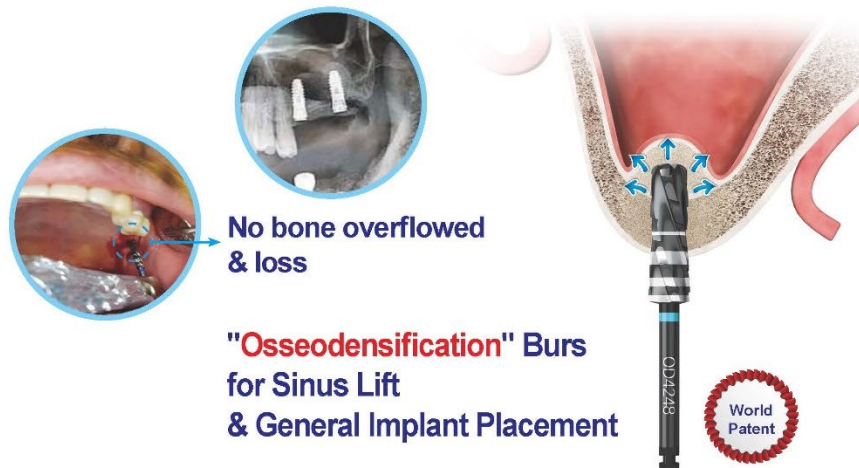
44. The HaeNaem Bur Kit and the Total HaeNaem Bur Kit are described in detail on HaeNaem's website haenaemdental.com.

45. The haenaemdental.com website includes descriptions of the HaeNaem Bur Kit and the Total HaeNaem Bur Kit and directions for use in English. [Ex. 9, available at <http://haenaemdental.com/archive/2020/30>; <http://haenaemdental.com/archive/2020/38>].

Haenaem Bur Kit (HNODK-100) for Sinus Lift & General Implant Placement



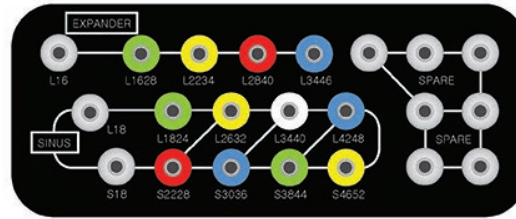
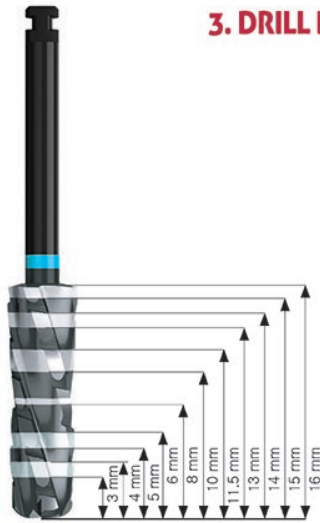
■ Detail View



■ The components



3. DRILL DEPTH & KIT SHAPE

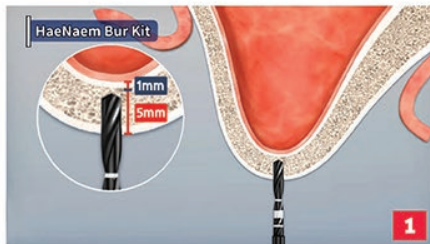


- Use all drills from RPM 800 to 1000
- Use all drills with Bounce Pumping
- When drilling L18 / L1824, using of stopper is recommended
- When using additional artificial bone, use as an irrigation OFF, lift RPM100

4. Sinus Lift sequence at 5mm OF RESIDUAL BONE



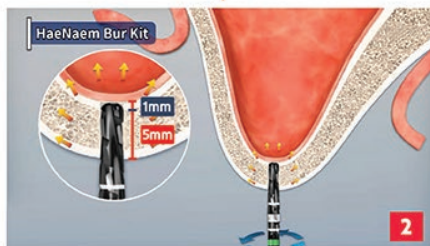
Drill up to 6mm with the S2228 Drill by bounce pumping



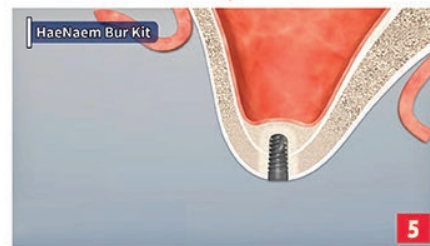
Guide Hole Formation (4MM) Before Using Sinus Drill(10')



Drill up to 8mm with the S3036 Drill by bounce pumping



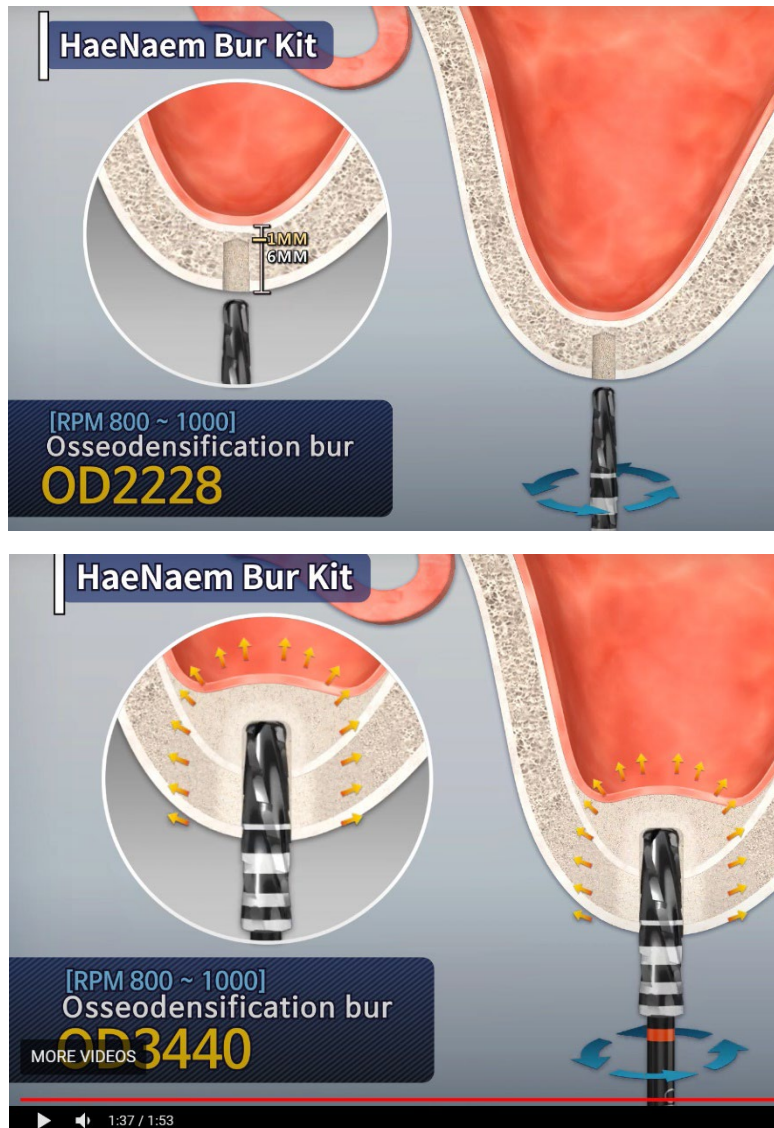
Bounce Pumping with L1824 drill for trepanation the maxillary sinus antrooralopening



Regular 4.0 Fixture implant placement

46. HaeNaem provides technique videos for the HaeNaem Bur Kit and the Total HaeNaem Bur Kit on its YouTube channel, also in English, which instruct surgeons how to use the HaeNaem Bur Kit and the Total HaeNaem Bur Kit. The

videos are available at: https://www.youtube.com/watch?v=4SQ2DPG_ulc and <https://www.youtube.com/watch?v=9vXGGLj07qU>. HaeNaem provides links to these technique videos on its haenaemdental.com website.



47. HaeNaem refers to itself as a “special export company” on its website.
48. HaeNaem applied for and was granted US Design Patent No. 915,595 for a dental implant drill on April 6, 2021.

49. HaeNaem has an active registration with the United States Food and Drug Administration in connection with “Accessories, Implant, Dental, Endosseous – Bone Collector Kit; Bone Expander Kit; Bone Mill Kit; Crestal Approach Sinus Pro Kit; Double A Guide Kit; Haenaem Bur Expander Kit; Haenaem Bur Sinus Kit; Initial Kit; Neat Tissue Former Kit; One Drilling System Kit; Tissue Punch Kit; Total Haenaem Bur Set; Total Remove Kit; Total Sinus Kit; Trephine Kit; V-Bone Collector.”

50. HaeNaem was therefore aware that their infringing products would foreseeably reach the United States.

51. Plaintiffs purchased both a HaeNaem Bur Kit and a Total HaeNaem Bur Kit in the United States. Specifically, Plaintiffs purchased both a HaeNaem Bur Kit and a Total HaeNaem Bur Kit through wholedent.com, which, on information and belief, is one of HaeNaem’s distributors having a U.S. warehouse.

52. A representative of wholedent.com indicated to Plaintiffs that it received the HaeNaem Bur Kit directly from HaeNaem. That representative also provided instructions for use for the HaeNaem Bur Kit to Plaintiffs.

53. The HaeNaem Bur Kit is also available for sale in the United States by US Dental Depot at [https://sa.usdentaldepot.com/Dental-supplies/Tool-Kits/Haenaem-Bur-Kit-for-Sinus-LiftO\(-\)P466316](https://sa.usdentaldepot.com/Dental-supplies/Tool-Kits/Haenaem-Bur-Kit-for-Sinus-LiftO(-)P466316). On information and belief, HaeNaem sells the HaeNaem Bur Kit to US Dental Depot.

54. Plaintiffs physically inspected the HaeNaem Bur Kit and the Total HaeNaem Bur Kit they received.

55. On September 13, 2022, Plaintiffs sent HaeNaem a cease-and-desist letter notifying HaeNaem of its infringement of the Asserted Patents through its sales of the HaeNaem Bur Kit and a Total HaeNaem Bur Kit and associated instructions and marketing. The letter is attached as Ex. 8.

56. Prior to the filing of this Complaint, Plaintiffs have provided copies of each of the Asserted Patents to HaeNaem and have explained to HaeNaem how each of the Asserted Patents is infringed by HaeNaem.

57. Plaintiffs also enclosed a claim chart outlining HaeNaem's infringement of at least one claim of each Asserted Patent by way of the HaeNaem Bur Kit and the Total HaeNaem Bur Kit. The claim charts cite to publicly available information, as well as information from Plaintiffs' own physical inspection.

58. HaeNaem had knowledge of the Asserted Patents and knowledge of its infringement of the Asserted Patents prior to this Complaint. HaeNaem admitted in a response letter to Plaintiffs' September 13 letter that it already had knowledge of "most patents owned by Versah" before receiving Plaintiffs' letter.

59. HaeNaem has knowingly and willfully continued its infringing activities after receiving Plaintiffs' letter. The HaeNaem Bur Kit and Total HaeNaem Bur Kit are still described on the haenaemdental.com website, the

English technique videos are still available, and the HaeNaem Bur Kit and Total HaeNaem Bur Kit are still available for sale in the United States.

60. The HaeNaem Bur Kit and Total HaeNaem Bur Kit each includes, among other things, at least one rotary osteotome configured to be turned continuously in one direction at high speed to enlarge an osteotomy in preparation to receive an implant or fixture device, the osteotome including: a shank, said shank establishing a longitudinal axis of rotation for said rotary osteotome, a body joined to said shank, said body having an apical end remote from said shank, said body having a conically tapered profile decreasing from a maximum diameter adjacent said shank to a minimum diameter adjacent said apical end, a plurality of helically spiraling flutes disposed about said body, a plurality of lands, each said land formed between adjacent flutes, each said land having a working edge helically twisting about said body in a direction that turns away from the non-cutting direction as said conically tapered profile decreases in diameter, said working edges configured to radially displace surrounding bone material through compaction when said osteotome is pushed into an osteotomy while being rotated in the high-speed non-cutting direction, said apical end including at least one lip extending radially from adjacent said longitudinal axis to one of said working edges, a radially outer portion of said grinding lip configured to grind bone material as said body advances into the osteotomy in the high-speed non-cutting

direction, said grinding lip having a generally planar first trailing flank, said first trailing flank being canted from said grinding lip at a first angle relative to said longitudinal axis, a generally planar second trailing flank falling away from said first trailing flank at a second angle smaller than said first angle relative to said longitudinal axis, a generally planar relief pocket falling away from said second trailing flank at a third angle smaller than said second angle relative to said longitudinal axis, at least one of said lip and said lands configured to generate an opposing axial reaction force when continuously rotated in a burnishing direction and concurrently forcibly advanced into an osteotomy, said opposing axial reaction force being directionally opposite to the forcibly advanced direction into the osteotomy, and an equal number of a plurality of said flutes opening directly into each said second trailing flank and said relief pocket so that when said apical end is pushed into the osteotomy and accompanied with high-speed rotation an equal number of a plurality of flutes are available to receive and then upwardly channel bone debris produced whether the rotation is in the non-cutting direction or in an opposite cutting direction, said working edges further configured to auto-grafting the bone debris particles channeled upwardly through said flutes for repatriation into the surrounding bone material.

61. The HaeNaem Bur Kit and Total HaeNaem Bur Kit each includes, among other things, at least one rotary osteotome operable in a cutting direction

and a reverse densifying direction, the osteotome including a shank establishing a longitudinal axis of rotation for the cutting and reverse densifying directions, a body extending from said shank, said body having an apical end remote from said shank, a plurality of helically spiraling flutes disposed about said body, each said flute having a cutting face on one side thereof defining a rake angle and a densifying face on the other side thereof defining a heel-side angle, for each said densifying face the associated said heel-side angle is a positive angle measured in the cutting direction, said flutes having an axial length and radial depth, a stopper section of said body disposed between said flutes and said shank, a land formed between each adjacent pair of flutes, each said land having a working edge along said cutting face of the one adjacent said flute, said working edge helically twisting about said body, and for each said cutting face at least a portion of the associated said rake angle is a negative rake angle measured in the cutting direction.

62. HaeNaem knowingly and intentionally instructs United States end users of the HaeNaem Bur Kit and Total HaeNaem Bur Kit to conduct a surgical method for expanding an initial osteotomy to receive a dental implant using continuous high-speed rotation, including providing a rotary osteotome having a tapered working end, the working end having a plurality of longitudinally extending burnishing edges; positioning the tapered working end of the osteotome over an open end of an initial osteotomy, the initial osteotomy having an interior

surface surrounded by bone and a bottom end; rotating the working end of the osteotome at high speed; enlarging the initial osteotomy by forcibly advancing the rotating working end into the initial osteotomy toward the bottom end so that the burnishing edges lap against the interior surface of the initial osteotomy without cutting into the surrounding bone to form an expanded osteotomy, the rate of said enlarging step being independent of the rate of rotation of the working end; and irrigating the initial osteotomy concurrently with said enlarging step. United States end users directly infringe by following these instructions.

63. HaeNaem knowingly and intentionally instructs United States end users of the HaeNaem Bur Kit and Total HaeNaem Bur Kit to conduct a surgical method for enlarging an osteotomy to receive a dental implant, including providing an osteotome having a tapered working end, the working end including a plurality of burnishing edges, positioning the working end of the osteotome over an open end of an osteotomy, the osteotomy having an interior surface surrounded by bone, and progressively advancing the working end of the osteotome into the osteotomy by continuously rotating the working end at speeds greater than 200 RPM while axially reciprocating the burnishing edges into and out of contact with the interior surface of the osteotomy. United States end users directly infringe by following these instructions.

64. HaeNaem knowingly and intentionally instructs United States end users of the HaeNaem Bur Kit and Total HaeNaem Bur Kit to conduct a low-impact surgical method for expanding an osteotomy using highspeed rotation, including providing a rotary osteotome having a tapered working end, the working end having a plurality of longitudinally extending burnishing edges; positioning the tapered working end of the osteotome over an open end of an osteotomy, the osteotomy having an interior surface surrounded by bone; rotating the working end of the osteotome at high speed; and enlarging the osteotomy by axially bouncing the rotating working end within the osteotomy so that the burnishing edges lap against the bone interior surface with downward motion and separate from the interior surface with upward motion in ever deepening movements that cause a progressive plastic deformation of the bone interior surface beginning adjacent the open end and developing downwardly into the osteotomy. United States end users directly infringe by following these instructions.

65. HaeNaem knowingly and intentionally instructs United States end users of the HaeNaem Bur Kit and Total HaeNaem Bur Kit to conduct a surgical method for enlarging an osteotomy to receive a dental implant using continuous high-speed rotation of a dental bur, including providing a dental bur having a tapered working end, the working end having a plurality of longitudinally extending blades; positioning the tapered working end of the dental bur so as to

enter an osteotomy to be enlarged, the osteotomy having a generally cylindrical or tapered interior surface of bone; rotating the working end of the dental bur at high speed; pushing the tapered working end into the osteotomy concurrently with said rotating step so that expansion of the osteotomy occurs in a frustoconically expanding manner as the blades sweep against the interior surface of the osteotomy in ever deepening movements; and irrigating the osteotomy concurrently with said pushing step. United States end users directly infringe by following these instructions.

66. HaeNaem knowingly and intentionally instructs United States end users of the HaeNaem Bur Kit and Total HaeNaem Bur Kit to conduct a surgical method for enlarging an osteotomy to receive an anchoring screw using continuous highspeed rotation of a bone expander tool, including providing a bone expander tool having a tapered working end, the working end having a plurality of longitudinally extending blades; positioning the tapered working end of the bone expander tool so as to enter an osteotomy to be enlarged, the osteotomy having a generally cylindrical or tapered interior surface of bone; rotating the working end of the bone expander tool at high speed greater than 200 RPM; pushing the tapered working end into the osteotomy concurrently with said rotating step so that expansion of the osteotomy occurs when the blades incrementally plastically deform the bone while being pressed against the interior surface of the osteotomy,

wherein said pushing step includes axially reciprocating the plurality of blades into and out of contact with the interior surface of the osteotomy; and irrigating the osteotomy concurrently with said pushing step. United States end users directly infringe by following these instructions.

67. HaeNaem knowingly and intentionally instructs United States end users of the HaeNaem Bur Kit and Total HaeNaem Bur Kit to conduct a surgical method for enlarging an osteotomy including a bone interior surface to receive an anchoring screw, including continuously rotating the working end of a bone expander tool in a non-cutting direction at speeds greater than 200 RPM, the working end being defined by a plurality of longitudinally extending blades each having a negative rake angle, and progressively advancing the working end into the osteotomy with an axial pumping motion while continuously rotating the working end so that the blades intermittently contact the interior surface of the osteotomy with downward pressure to plastically deform the bone interior surface in a radially outward direction. United States end users directly infringe by following these instructions.

68. HaeNaem, with the requisite knowledge and intent, actively induces companies to sell and offer for sale the HaeNaem Bur Kit and Total HaeNaem Bur Kit in the United States.

COUNT I

(DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,039,621)

69. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

70. HaeNaem has directly infringed, literally or under the doctrine of equivalents, at least claim 1 of the '621 patent by selling, offering for sale, and/or importing into the United States, without authority, the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

71. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 1 of the '621 patent is attached in Ex. 8.

COUNT II

(DIRECT INFRINGEMENT OF U.S. PATENT NO. 10,980,548)

72. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

73. HaeNaem has directly infringed, literally or under the doctrine of equivalents, at least claim 1 of the '548 patent by selling, offering for sale, and/or importing into the United States, without authority, the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

74. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 1 of the '548 patent is attached in Ex. 8.

COUNT III

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 9,022,783)

75. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

76. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claims 1 and 15 of the '783 patent by actively inducing United States customers to infringe at least claims 1 and 15 of the '783 patent. These customers directly infringe at least claims 1 and 15 of the '783 patent by performing the claimed method knowingly and intentionally instructed by HaeNaem with the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

77. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claims 1 and 15 of the '783 patent is attached in Ex. 8.

COUNT IV

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 9,028,253)

78. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

79. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claim 1 of the '253 Patent by actively inducing United States customers to infringe at least claim 1 of the '253 Patent. These customers directly infringe at least claim 1 of the '253 patent by performing the claimed method knowingly and intentionally instructed by HaeNaem with the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

80. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 1 of the '253 Patent is attached in Ex. 8.

COUNT V

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 9,526,593)

81. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

82. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claim 4 of the '593 Patent by actively inducing United States

customers to infringe at least claim 4 of the ‘593 Patent. These customers directly infringe at least claim 4 of the ‘593 patent by performing the claimed method knowingly and intentionally instructed by HaeNaem with the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

83. An exemplary claim chart based upon publicly available information and Plaintiffs’ own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 4 of the ‘593 Patent is attached in Ex. 8.

COUNT VI

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 9,737,312)

84. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

85. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claims 1, 8, 13, and 14 of the ‘312 Patent by actively inducing United States customers to infringe at least claims 1, 8, 13, and 14 of the ‘312 Patent. These customers directly infringe at least claims 1, 8, 13, and 14 of the ‘312 Patent by performing the claimed method knowingly and intentionally instructed by HaeNaem with the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

86. An exemplary claim chart based upon publicly available information and Plaintiffs’ own physical inspection illustrating how the HaeNaem Bur Kit and

Total HaeNaem Bur Kit meets each and every limitation of claims 1, 8, 13, and 14 of the '312 Patent is attached in Ex. 8.

COUNT VII

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 10,039,621)

87. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

88. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claim 1 of the '621 Patent by actively inducing others to sell and offer for sale the HaeNaem Bur Kit and Total HaeNaem Bur Kit in the United States to infringe at least claim 1 of the '621 Patent. These companies directly infringe at least claim 1 of the '621 Patent by selling and offering for sale the HaeNaem Bur Kit and Total HaeNaem Bur Kit in the United States.

89. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 1 of the '621 Patent is attached in Ex. 8.

COUNT VIII

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 10,568,639)

90. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

91. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claim 1 of the '639 Patent by actively inducing United States customers to infringe at least claim 1 of the '639 Patent. These customers directly infringe at least claim 1 of the '639 Patent by performing the claimed method knowingly and intentionally instructed by HaeNaem with the HaeNaem Bur Kit and Total HaeNaem Bur Kit.

92. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 1 of the '639 Patent is attached in Ex. 8.

COUNT IX

(INDIRECT INFRINGEMENT OF U.S. PATENT NO. 10,980,548)

93. Plaintiffs incorporate by reference all of the preceding paragraphs as though fully set forth herein.

94. HaeNaem has indirectly infringed, literally or under the doctrine of equivalents, at least claim 1 of the '639 Patent by actively inducing actively inducing others to sell and offer for sale the HaeNaem Bur Kit and Total HaeNaem Bur Kit in the United States to infringe at least claim 1 of the '639 Patent. These companies directly infringe at least claim 1 of the '639 Patent by selling and

offering for sale the HaeNaem Bur Kit and Total HaeNaem Bur Kit in the United States.

95. An exemplary claim chart based upon publicly available information and Plaintiffs' own physical inspection illustrating how the HaeNaem Bur Kit and Total HaeNaem Bur Kit meets each and every limitation of claim 1 of the '639 Patent is attached in Ex. 8.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for a judgment in their favor granting the following relief:

- A. A finding the HaeNaem has infringed the Asserted Patents;
- B. A permanent injunction barring HaeNaem, and all persons acting in concert with them, from infringing the Asserted Patents;
- C. An award of money damages pursuant to 35 U.S.C. § 284 in an amount adequate to compensate Plaintiffs for HaeNaem's infringement of the Asserted Patents;
- D. A finding that this is an exceptional case within the meaning of 35 U.S.C. § 285, and a corresponding award of Plaintiffs' reasonable attorney fees incurred in connection with this litigation;
- E. An award of pre-judgment interest and costs, in amounts fixed by the Court; and
- F. Any additional and further relief the Court deems just and proper.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Versah hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

CARLSON, GASKEY & OLDS, P.C.

Dated: October 19, 2022

/s/ Steven Susser

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