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8 *Attorney for Plaintiff Sport Squad, Inc. d/b/a JOOLA*

9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF ARIZONA

11 Sport Squad, Inc. d/b/a JOOLA,  
12 Plaintiff,  
13 v.  
14 Paddletek, LLC,  
15 Defendant.

Case No.

**COMPLAINT FOR PATENT  
INFRINGEMENT OF U.S. PATENT  
NO. 12,465,826**

**DEMAND FOR JURY TRIAL**

16  
17 Plaintiff Sport Squad, Inc. D/B/A JOOLA (“Plaintiff” or “JOOLA”) by and through its  
18 undersigned counsel, files this Complaint for Patent Infringement against Defendant Paddletek,  
19 LLC (“Paddletek”) and alleges on knowledge as to its actions, and upon knowledge and  
20 information and belief as to the actions of others, as follows:

21 **NATURE OF THE ACTION**

22 1. This action arises under the patent laws of the United States, 35 U.S.C. §§ 1, *et seq.*,  
23 from Paddletek’s infringement of U.S. Patent No. 12,465,826 (the “’826 Patent” or the “Asserted  
24 Patent”).

25 **THE PARTIES**

26 2. Plaintiff Sport Squad, Inc. d/b/a JOOLA is a corporation organized under the laws  
27 of Maryland with its principal operating business located at 915 Meeting Street, North Bethesda,  
28 Maryland 20852.



1           12.     Paddletek has infringed and continues to infringe the '826 Patent by making, using,  
2 selling, offering to sell, and/or importing products including, but not limited to, the Paddletek  
3 Reserve Paddle.

4           13.     Throughout its infringement, Paddletek has had actual knowledge of JOOLA's  
5 '826 Patent and of Paddletek's infringement of the '826 Patent.

6                           **COUNT I: INFRINGEMENT OF THE '826 PATENT**

7           14.     JOOLA realleges and incorporates by reference each of its allegations in paragraphs  
8 1-13 of this Complaint.

9           15.     JOOLA has not licensed or otherwise authorized Paddletek to make, use, offer for  
10 sale, sell, or import any products that embody the inventions of the '826 Patent.

11           16.     As shown in the attached non-limiting claim chart (**Exhibit 2**), by making, using  
12 (at least by testing), selling, offering for sale, or importing the Accused Product in this Judicial  
13 District and throughout the United States without license or authorization, Paddletek is now and  
14 has been directly infringing at least claim 1 of the '826 Patent, either literally or under the doctrine  
15 of equivalents, as proscribed by 35 U.S.C. § 271, *et seq.*

16           17.     Exhibit 2 is intended solely to satisfy the notice requirements of Federal Rule of  
17 Civil Procedure 8(a)(2), and does not represent JOOLA's preliminary or final infringement  
18 contentions or preliminary or final claim construction positions. JOOLA reserves the right to  
19 modify its infringement theories reflected in Exhibit 2 as discovery progresses in this case,  
20 including through contentions disclosures and claim construction in accordance with the Patent  
21 Local Rules in this District.

22           18.     As a direct and proximate result of Paddletek's direct infringement of the '826  
23 Patent, JOOLA has been and continues to be damaged. Paddletek's infringing activities will  
24 continue unless enjoined by this Court or until the patent expires, whichever is sooner.

25           19.     By engaging in the conduct described herein, Paddletek has injured JOOLA and is  
26 thus liable for infringement of the '826 Patent, pursuant to 35 U.S.C. § 271.

27           20.     Paddletek has committed and continues to commit acts of infringement that  
28 Paddletek actually knew or should have known constituted an unjustifiably high risk of

1 infringement of at least one valid and enforceable claim of the '826 Patent. Paddletek's direct  
2 infringement of the '826 Patent has been and continues to be willful, intentional, deliberate, or in  
3 conscious disregard of rights under the patent. JOOLA is entitled to an award of treble damages,  
4 reasonable attorney fees, and costs in bringing this action.

5 **JURY DEMAND**

6 21. JOOLA hereby demands a trial by jury on all issues so triable.

7 **PRAYER FOR RELIEF**

8 WHEREFORE, JOOLA prays for the following relief against Paddletek as follows:

- 9 A. Entry of judgment declaring that Paddletek has infringed one or more claims of  
10 the '826 Patent;
- 11 B. Entry of judgment declaring that Paddletek's infringement of the '826 Patent has  
12 been willful and deliberate;
- 13 C. An order pursuant to 35 U.S.C. § 283 permanently enjoining Paddletek, their  
14 officers, agents, servants, employees, attorneys, and those persons in active  
15 concert or participation with them, from further acts of infringement of the '826  
16 Patent;
- 17 D. An order awarding damages sufficient to compensate JOOLA for Paddletek's  
18 infringement of the '826 Patent, but in no event less than a reasonable royalty,  
19 together with interest and costs;
- 20 E. An order awarding JOOLA treble damages under 35 U.S.C. § 284 as a result of  
21 Paddletek's willful and deliberate infringement of the '826 Patent;
- 22 F. Entry of judgment declaring that this case is exceptional and awarding JOOLA its  
23 costs and reasonable attorney fees under 35 U.S.C. § 285; and
- 24 G. Such other and further relief as this Court may deem just and proper.
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1 Dated: April 9, 2026

Respectfully submitted,

2  
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