

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

**ISLA MAPPING, LLC,
a Florida company,**

Plaintiff,

vs.

**JOHNSON OUTDOORS MARINE
ELECTRONICS, INC, an
Alabama corporation,**

Defendant.

Case No.: ---

JURY TRIAL REQUESTED

**INJUNCTIVE RELIEF
REQUESTED**

COMPLAINT

Plaintiff ISLA Mapping, LLC, through its undersigned counsel, for its Complaint against the Defendant listed above and alleges as follows:

I. THE PARTIES

1. Plaintiff, ISLA Mapping, LLC (“ISLA Mapping”), is a Florida limited liability company with its principal place of business at 27 Windsor Isle Drive, Longwood, FL 32779.

2. Upon information and belief, Johnson Outdoors Marine Electronics, Inc. (“Johnson Outdoors”) is an Alabama corporation, with a principal address of 555 Main Street Ste 242, Racine, WI 53403. Johnson Outdoors is registered as a foreign profit corporation with the State of Florida, appointing CT Corporation System as its agent for service at CT Corporation System’s service address of 1200 South Pine Island Rd, Plantation, FL 33324.

II. JURISDICTION AND VENUE

3. This action arising under the U.S. Copyright Act (17 U.S.C. §501 et seq.) and the Lanham Act (15 U.S.C. §1125 et seq), and thus this Court has federal question jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), as well as supplemental jurisdiction under 28 U.S.C. §1367 as to the state law claim.

4. As fully set forth herein, Defendant has used and distributed infringing derivative works of ISLA Mapping’s “Florida Marine Tracks” detailed navigational charts (also referred to herein as maps), which are the subject of U.S. Copyright Registrations.

5. This Court has personal jurisdiction over the Defendant because it is registered with the state to do business here, has in fact conducted business here, and has continuous and systematic contacts with the State of Florida and this District.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b), (c) and 1400(a) in that a substantial part of the events or omissions giving rise to the claims herein occurred in this District.

III. PLAINTIFF'S COPYRIGHTED WORKS

7. For more than a decade, ISLA Mapping has created navigation charts licensed and marketed under the name “Florida Marine Tracks,” which are separately available for North Florida and South Florida waters. ISLA Mapping also offers “Louisiana Marine Tracks” as well. Florida Marine Tracks, the premiere GPS shallow water navigation map, is available through ISLA Mapping’s website: <https://floridamarinetracks.com/>.

8. The founder of ISLA Mapping, Glenn Housman, is an experienced boater and fisherman who has personally navigated many thousands of miles of waterways in Florida since the late 1990's. To create the navigational charts offered by ISLA Mapping, Housman begins with an analysis of aerial and satellite images acquired from a variety of sources which are carefully edited and spliced together in a manner that greatly improves the clarity, contrast, color, professional presentation, and readability of traditional map images available on marine GPS equipment. The final processing of the images allows users to zoom in with clarity on a GPS to as good as 50-100 feet in most locations with minimal loss in resolution.

9. Of the countless different routes available to boaters, Housman physically tests and plots the "tracks" he believes are the best options based on his decades of experience as a boater and fisherman. These "tracks" are not necessarily dictated by bathymetry, but are those tracks tested and verified by Housman. In other words, while there may be a thousand different options for a boater to navigate from point A to point B, the tracks selected and plotted by Housman are not always confined by the deepest water or the shortest route, but instead are based on Housman's experience and his testing of multiple routes to assist boaters, and in particular fishermen, to allow for efficient safe navigational routes while boating in the nearshore waters of Florida in a typical vessel used to navigate shallow waters inshore that draft approximately one foot or less (skiffs and most modern bay boats).

10. Based on actual on-water navigation, Housman has detailed safe boating tracks that carefully identify and traverse the precise location of dangerous obstacles,

including flats and bars, shallow water navigational posts, stakes, signs, submerged rocks and debris, etc., many of which are not found on any other conventional navigation charts. Informed by this unique knowledge and experience, over the years, ISLA Mapping has added many thousands of miles of proven low tide tracks as an additional optional map layer, giving users the ability to follow a track from virtually any location in any direction, even tailored to high tide and low tide conditions.

11. Ultimately, a primary goal is to provide users with tried and tested tracks that can be used by other boaters to avoid running aground or damaging their boats or the lower unit of their motors, yet while providing convenience and flexibility for boaters. The accuracy or detail of charts from ISLA Mapping is unmatched by any competitor, and the design choices it makes in creating its tracks are the result of literally thousands of hours of on the water experience and shallow water navigation expertise over more than a decade of focused boating and mapping on the water.

12. There are several commercial chart plotters that have been designed to operate with third party mapping products such as ISLA Mapping's charts, making it easy to load and use on these platforms. For example, ISLA Mapping charts are compatible with most Navico chart plotters (including Simrad, Lowrance, and B&G units) and also Raymarine Axiom units.

13. ISLA Mapping has registered its North Florida and South Florida charts. Pertinent to this action, on March 12, 2025, ISLA Mapping duly registered the copyrights to the "GPS Marine Tracks for South Florida (2023)" and to the "GPS Marine Tracks for North Florida (2023)," in the United States Copyright Office, as evidenced by the

certificates of registration for Copyright Numbers VA0002438717 and VA0002438720 (respectively), which were issued by the Register of Copyrights. A true and accurate copy of the certificate of the registrations are attached hereto as Exhibits A and B, respectively. As referenced herein, the “Registered Works” includes the “GPS Marine Tracks for South Florida (2023)” and the “GPS Marine Tracks for North Florida (2023).”

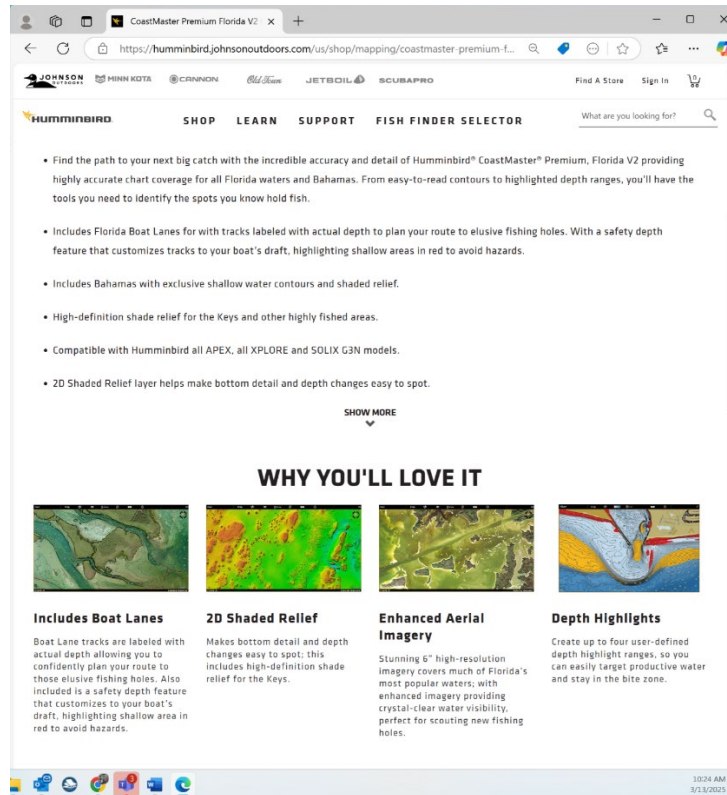
IV. DEFENDANTS’ COPYRIGHT INFRINGEMENT

14. Housman has approached Johnson Outdoors on several occasions to discuss opening up the Humminbird® GPS platforms to use Florida Marine Tracks, including by telephone to the Johnson Outdoors corporate office in 2016 where he spoke with a senior executive and subsequently at different boat shows in person and an annual ICAST convention in person, because the incorporation of Florida Marine Tracks would help sell more Humminbird GPS units. In the first half of 2020, a gentleman who identified himself as the head of the mapping department with Johnson Outdoors and a former head of Navionics (a global electronics mapping company purchased by Garmin in 2017), contacted Housman directly to request a meeting in Florida to discuss ISLA Mapping’s Florida Map Tracks. Thereafter, three different meeting dates were set up with Housman in Florida, but reportedly due to COVID travel restrictions, each of the planned meetings was cancelled and never occurred even though Housman had no personal COVID concerns expressed and was willing to meet in each planned instance. Johnson Outdoors did not reach out thereafter. Upon information and belief, Johnson Outdoors had actual knowledge of ISLA Mapping’s Florida Map Tracks years before copying them for use in Humminbird® GPS platforms.

15. In early 2025, Johnson Outdoor launched its Humminbird® CoastMaster® Premium Florida V2 product, which “simplifies navigation with precisely verified Florida boat lanes...” According to the press release, “With CoastMaster Florida Premium V2, we’ve developed a tool that ensures anglers can confidently navigate these waters while discovering prime fishing spots with unmatched precision. Our goal is to provide the clarity and accuracy needed to enhance every fishing trip.” (<http://humminbird.johnsonoutdoors.com/us/news/coastmaster-florida-premium-v2-with-boat-lanes>).

16. Upon information and belief, the Humminbird® CoastMaster® Premium Florida V2 product distributed by Johnson Outdoors includes an extensive number of tracks that were copied without permission from, and therefore infringe upon, the Registered Works. As used herein, the “Infringing Work” shall mean the maps in the Humminbird® CoastMaster® Premium Florida V2 product. Johnson Outdoors had actual knowledge of the Registered Works and ISLA Mapping’s rights therein, and as such, its infringement is willful.

17. The Humminbird® website specifically touts the inclusion in the Infringing Work of “Florida Boat Lanes for with [*sic*] tracks labeled with actual depth to plan your route to elusive fishing holes. With a safety depth feature that customizes tracks to your boat’s draft, highlighting shallow areas in red to avoid hazards.”



18. The Humminbird® CoastMaster® product is a Secure Digital (“SD”) memory card preloaded with charts that can be installed in compatible Humminbird® GPS devices, as promoted on the Humminbird® website: (see, e.g., <https://humminbird.johnsonoutdoors.com/us/shop/mapping/coastmaster-premium-florida-v2-bahamas>).

19. Notably, the Infringing Work is by far the most expensive mapping chip available through the Humminbird® website. None of the other mapping chips available on Johnson Outdoor’s website appear to have the “Boat Lanes” featured incorporated therein.

20. Attached hereto as Exhibit C, which includes screen shots of the deposit copy of the Registered Works and the Infringing Work. The side-by-side comparison

demonstrates the substantial similarity between the two. For example, in each screen shot there are numerous tracks that have an arbitrary shape, length and location, and for which the “Boat Lanes” in the Infringing Work are identical or nearly identical.

21. Upon information and belief, the integration of the Infringing Work into products of Johnson Outdoors has generated sales and profits directly from its infringement, and have negatively impacted ISLA Mapping’s sales and revenue.

22. Johnson Outdoors copied the Registered Works and continues to market and sell the Infringing Work, for which no license or authorization has been provided, and no compensation has been paid to ISLA Mapping.

23. As a result of foregoing infringing conduct, ISLA Mapping has suffered significant harm and loss.

24. As the owner of the Registered Works, ISLA Mapping has an interest in protecting its rights against such copyright infringement.

COUNT ONE
Copyright Infringement

25. ISLA Mapping incorporates by reference the averments contained in the preceding paragraphs 1-24 above, as if set forth fully herein.

26. Count One is an action under 17 U.S.C. § 501 for direct infringement of registered copyright(s) as against Johnson Outdoors.

27. ISLA Mapping is the owner of valid copyright registrations VA0002438717 and VA0002438720.

28. ISLA Mapping has complied in all respects with the provisions of the Copyright Act, 17 U.S.C. §§ 101 et seq., and all other laws governing copyright to secure the exclusive rights and privileges in and to the copyrights of the items identified herein.

29. Johnson Outdoors copied the Registered Works to prepare the Infringing Work, which is strikingly similar and the lesser standard of substantially similar to the Registered Works.

30. If not strikingly similar, Johnson Outdoors copied the Registered Works to prepare the Infringing Work, which is substantially similar to the Registered Works, and had access to the Registered Works.

31. The distribution of the Infringing Work resulted in actual damage to ISLA Mapping, including but not limited to the loss of licensing revenue lost as a result of Johnson Outdoor's infringement.

32. Pursuant to 17 U.S.C. §§ 503(a) and 503(b), ISLA Mapping is entitled to an order impounding the infringing articles and the means by which such infringing articles were produced and/or reproduced.

33. Pursuant to 17 U.S.C. § 504, ISLA Mapping is also entitled to recover actual damages and any profits of Defendants.

34. Pursuant to 17 U.S.C. § 505, ISLA Mapping is entitled to an award of attorneys' fees and costs.

WHEREFORE, ISLA Mapping asks this Court to enter preliminary and final orders and judgments as necessary to provide ISLA Mapping the following requested relief:

- a) Finding Johnson Outdoor liable for copyright infringement by virtue of its unauthorized use and sale of the Infringing Work;
- b) A permanent injunction enjoining and restraining Johnson Outdoors and their officers, directors, principals, agents, servants, employees, successors, assigns, attorneys, and all those persons in active concert or participation therewith who received actual notice of this Court's orders from infringing ISLA Mapping's copyrights;
- c) An award of all allowable damages against Johnson Outdoors, including those damages available under §504;
- d) An award under 17 U.S.C. § 505 allowing recover of the full costs of this action, including ISLA Mapping's reasonable attorneys' fees and costs; and
- e) Such other relief as the Court deems appropriate.

COUNT TWO
Unfair Competition (15 U.S.C. §1125)

35. ISLA Mapping incorporates by reference the averments contained in the preceding paragraphs 1-24 above, as if set forth fully herein.

36. Count Two is an action under 15 U.S.C. §1125 for unfair competition against Johnson Outdoors.

37. For more than a decade ISLA Mapping has licensed and marketed navigation and fishing charts under the name “Florida Marine Tracks.” Since 2015, thousands of boaters and fishermen purchased, use and have come to recognize and trust Florida Marine Tracks as the premiere navigational product of its kind, and associate Florida Marine Tracks with ISLA Mapping.

38. By virtue of its Humminbird® CoastMaster® Premium Florida V2 product with “Florida Boat Lanes,” Johnson Outdoors is now a direct competitor of ISLA Mapping.

39. Johnson Outdoors markets its GPS fishing maps under the name “Florida Boat Lanes,” while promoting this particular feature as “tracks labeled with actual depth to plan your route to elusive fishing holes,” which is confusingly similar to ISLA Mapping’s Florida Marine Tracks product.

40. The marketing and use by Johnson Outdoors of the “Florida Boat Lanes” feature is misleading and deceiving, materially constitutes knowing use of a false designation of origin and a false description or representation that wrongly and falsely designates the origin, sponsorship or approval of Johnson Outdoors’ product, and constitutes utilizing false descriptions or representations in commerce.

41. The unauthorized use of the false, misleading, and deceiving material causes irreparable injury to ISLA Mapping, including injury to its reputation and/or dilution of the distinctive quality of its product.

42. Johnson Outdoors' misleading material has caused and is likely to continue to cause confusion and damage to ISLA Mapping, and in fact has already caused actual confusion in the industry.

43. Johnson Outdoors has acted with intent to profit, and has profited, from the goodwill associated with ISLA Mapping's Florida Marine Tracks product.

44. Johnson Outdoors' unlawful activity results in irreparable harm and injury to ISLA Mapping, including causing confusion among the public, that will continue unless restrained.

45. ISLA Mapping is entitled to an injunction restraining Johnson Outdoors, its officers, agents and employees, and all persons acting in concert with it, from engaging in any further acts in violation of 15 U.S.C. §1114, 1115 and 1117.

46. ISLA Mapping is further entitled to recover from Johnson Outdoors all available damages, including treble damages, interest and attorney fees and costs, it has sustained and will sustain, and any gains, profits, and advantages obtained by Johnson Outdoors as a result of its acts as alleged herein. At present, the amount of such damages, gains, profits and advantages cannot be fully ascertained.

47. ISLA Mapping has no adequate complete remedy at law to resolve the confusion being caused by Johnson Outdoors.

WHEREFORE, ISLA Mapping asks this Court to enter final orders and judgments as necessary to provide ISLA Mapping the following requested relief:

- a) Finding Johnson Outdoor liable for unfair competition;
- b) A permanent injunction enjoining and restraining Johnson Outdoors and their officers, directors, principals, agents, servants, employees, successors, assigns, attorneys, and all those persons in active concert or participation therewith who received actual notice of this Court's orders:
 - i. from engaging in any acts of unfair competition and from implying a false designation of origin or a false description or representation between ISLA Mapping's products and those of Johnson Outdoors;
 - ii. from engaging in any acts of unfair competition by passing off or inducing or enabling others to sell or pass off goods/services as those of ISLA Mapping;
 - iii. from engaging in any acts of unfair competition, false or misleading descriptions of fact or false or misleading statements of fact that misrepresent the nature, characteristics and/or qualities of Johnson Outdoors' goods or services; and
 - iv. from directly or indirectly using false and misleading material and/or promotional material which are likely to cause

confusion or further irreparable harm to ISLA Mapping's business reputation or goodwill;

- c) An award of all available damages against Johnson Outdoors, including those available under §1117;
- d) An award under §1117 for the recovery of ISLA Mapping's reasonable attorneys' fees and costs; and
- e) Such and other relief as the Court deems appropriate.

COUNT THREE
Common Law Unfair Competition

48. ISLA Mapping incorporates by reference the averments contained in the preceding paragraphs 1-24 above, as if set forth fully herein.

49. Count Three is an action for unfair competition against Johnson Outdoors under Florida common law.

50. For more than a decade ISLA Mapping has licensed and marketed fishing charts under the name "Florida Marine Tracks." Countless boaters and fishermen have come to recognize and trust Florida Marine Tracks as the premiere navigational product of its kind, and associate Florida Marine Tracks with ISLA Mapping.

51. By virtue of its Humminbird® CoastMaster® Premium Florida V2 product with "Florida Boat Lanes," Johnson Outdoors is now a direct competitor of ISLA Mapping.

52. Johnson Outdoors markets its GPS fishing maps under the name "Florida Boat Lanes," while promoting this particular feature as "tracks labeled with actual depth

to plan your route to elusive fishing holes,” which is confusingly similar to ISLA Mapping’s Florida Marine Tracks product.

53. The marketing and use by Johnson Outdoors of the “Florida Boat Lanes” feature is misleading, deceiving and constitutes unfair competition under Florida law.

54. The unauthorized use of the false, misleading, and deceiving material causes irreparable injury to ISLA Mapping, including injury to its reputation and/or dilution of the distinctive quality of its product.

55. Johnson Outdoors’ misleading material has caused and is likely to continue to cause confusion and damage to ISLA Mapping, and in fact has already caused actual confusion in the industry.

56. Johnson Outdoors has acted with intent to profit, and has profited, from the goodwill associated with ISLA Mapping’s Florida Marine Tracks product.

57. Johnson Outdoors’ unlawful activity results in irreparable harm and injury to ISLA Mapping, including causing confusion among the public, that will continue unless restrained.

58. ISLA Mapping is entitled to an injunction restraining Johnson Outdoors, its officers, agents and employees, and all persons acting in concert with it, from engaging in any further acts of unfair competition.

59. ISLA Mapping is further entitled to recover from Johnson Outdoors all available damages, including punitive damages, interest and attorney fees and costs, it has sustained and will sustain, and any gains, profits, and advantages obtained by Johnson

Outdoors as a result of its acts as alleged herein. At present, the amount of such damages, gains, profits and advantages cannot be fully ascertained.

60. ISLA Mapping has no adequate complete remedy at law to resolve the confusion being caused by Johnson Outdoors.

WHEREFORE, ISLA Mapping asks this Court to enter final orders and judgments as necessary to provide ISLA Mapping the following requested relief:

- a) Finding Johnson Outdoor liable for common law unfair competition;
- b) A permanent injunction enjoining and restraining Johnson Outdoors and their officers, directors, principals, agents, servants, employees, successors, assigns, attorneys, and all those persons in active concert or participation therewith who received actual notice of this Court's orders:
 - i. from engaging in any acts of unfair competition and from implying a false designation of origin or a false description or representation between ISLA Mapping's products and those of Johnson Outdoors;
 - ii. from engaging in any acts of unfair competition by passing off or inducing or enabling others to sell or pass off goods/services as those of ISLA Mapping;
 - iii. from engaging in any acts of unfair competition, false or misleading descriptions of fact or false or misleading

- statements of fact that misrepresent the nature, characteristics and/or qualities of Johnson Outdoors' goods or services; and
- iv. from directly or indirectly using false and misleading material and/or promotional material which are likely to cause confusion or further irreparable harm to ISLA Mapping's business reputation or goodwill;
- c) An award of all available damages against Johnson Outdoors, including punitive damages;
- d) An award of costs; and
- e) Such and other relief as the Court deems appropriate.

JURY DEMAND

ISLA Mapping demands a jury trial on all issues so triable.

Respectfully submitted April 3, 2025.

/s/Ryan T. Santurri
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Facsimile: (407) 841-2343

Counsel for Plaintiff,
ISLA Mapping, LLC

Exhibit A



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shirley P. Matthews

United States Register of Copyrights and Director

Registration Number

VA 2-438-717

Effective Date of Registration:

March 12, 2025

Registration Decision Date:

March 21, 2025



Title

Title of Work: GPS Marine Tracks for South Florida (2023)

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: February 16, 2023

Nation of 1st Publication: United States

Author

- Author:** Isla Mapping LLC
- Author Created:** revised map
- Work made for hire:** Yes
- Domiciled in:** United States

Copyright Claimant

Copyright Claimant: Isla Mapping LLC
27 Windsor Isle Drive, Longwood, FL, 32779, United States

Limitation of copyright claim

Material excluded from this claim: previously registered map, preexisting satellite images

Previous registration and year: VAu 1-048-539, 2010

New material included in claim: revised map

Rights and Permissions

Name: Ryan T. Santurri
Email: rsanturri@allendyer.com
Telephone: (407)841-2330
Address: 255 S. Orange Avenue
Suite 1401

Orlando, FL 32801 United States

Certification

Name: Glenn D. Housman

Date: March 12, 2025

Applicant's Tracking Number: 0139383

Correspondence: Yes

Exhibit B

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number**VA 2-438-720****Effective Date of Registration:**

March 12, 2025

Registration Decision Date:

March 21, 2025

**Title**

Title of Work: GPS Marine Tracks for North Florida (2023)

Completion/Publication

Year of Completion: 2023
Date of 1st Publication: January 16, 2023
Nation of 1st Publication: United States

Author

- Author:** Isla Mapping LLC
Author Created: revised map
Work made for hire: Yes
Domiciled in: United States

Copyright Claimant

Copyright Claimant: Isla Mapping LLC
27 Windsor Isle Drive, Longwood, FL, 32779, United States

Limitation of copyright claim

Material excluded from this claim: previously registered map, preexisting satellite images
Previous registration and year: VAu001048539, 2010
New material included in claim: revised map

Rights and Permissions

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Orlando, FL 32801 United States

Certification

Name: Glenn D. Housman

Date: March 12, 2025

Applicant's Tracking Number: 0139382

Correspondence: Yes

Exhibit C

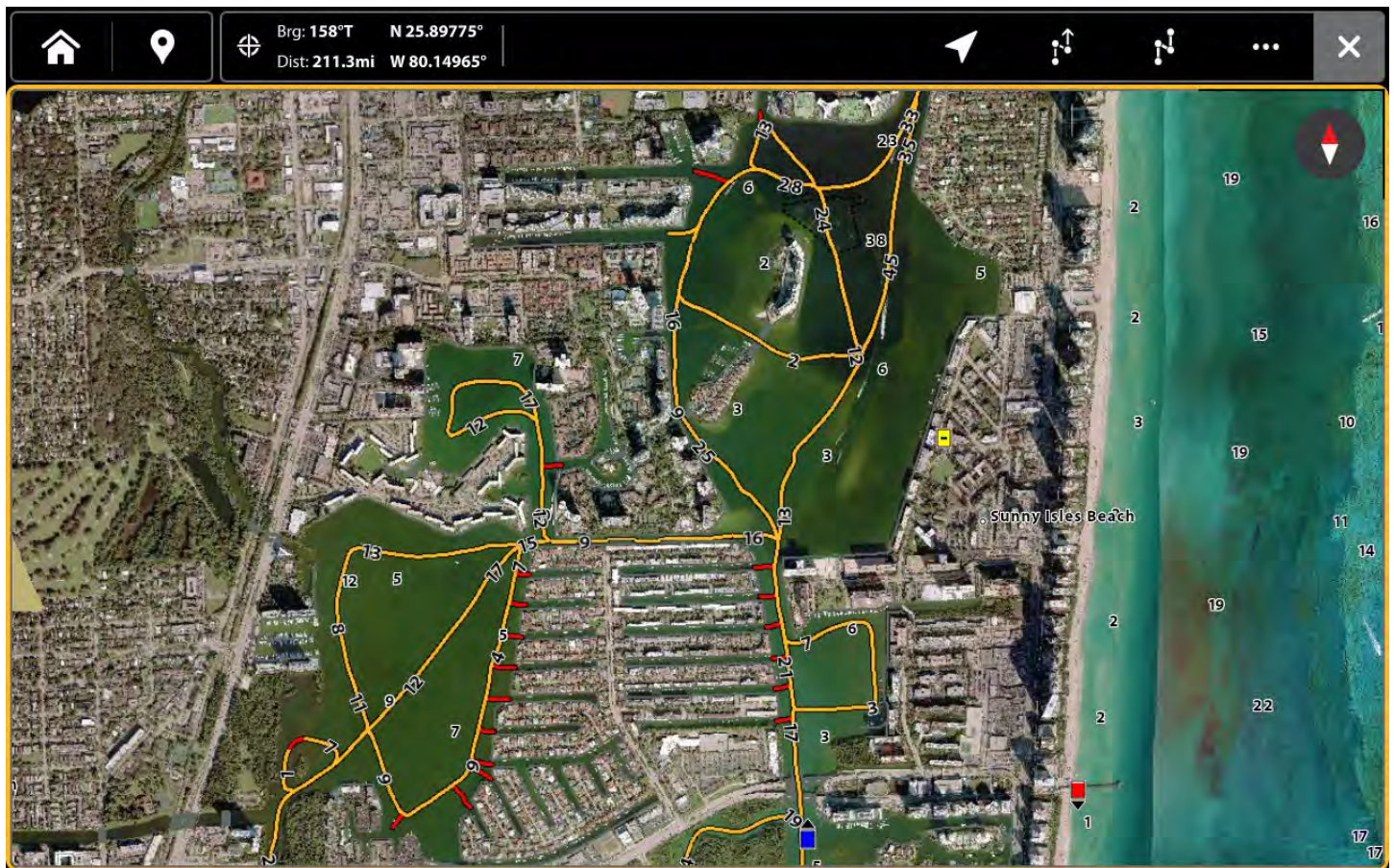
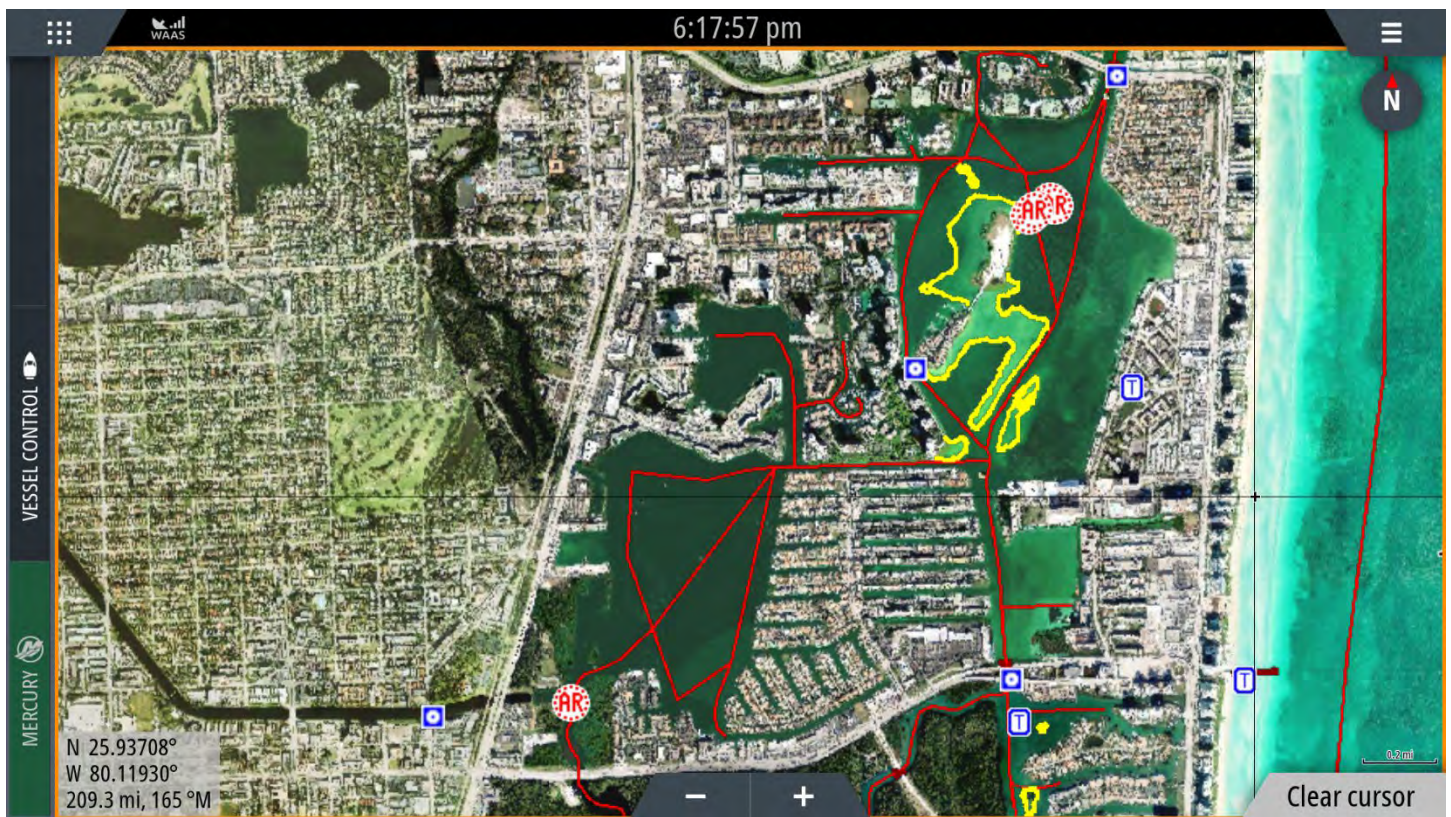
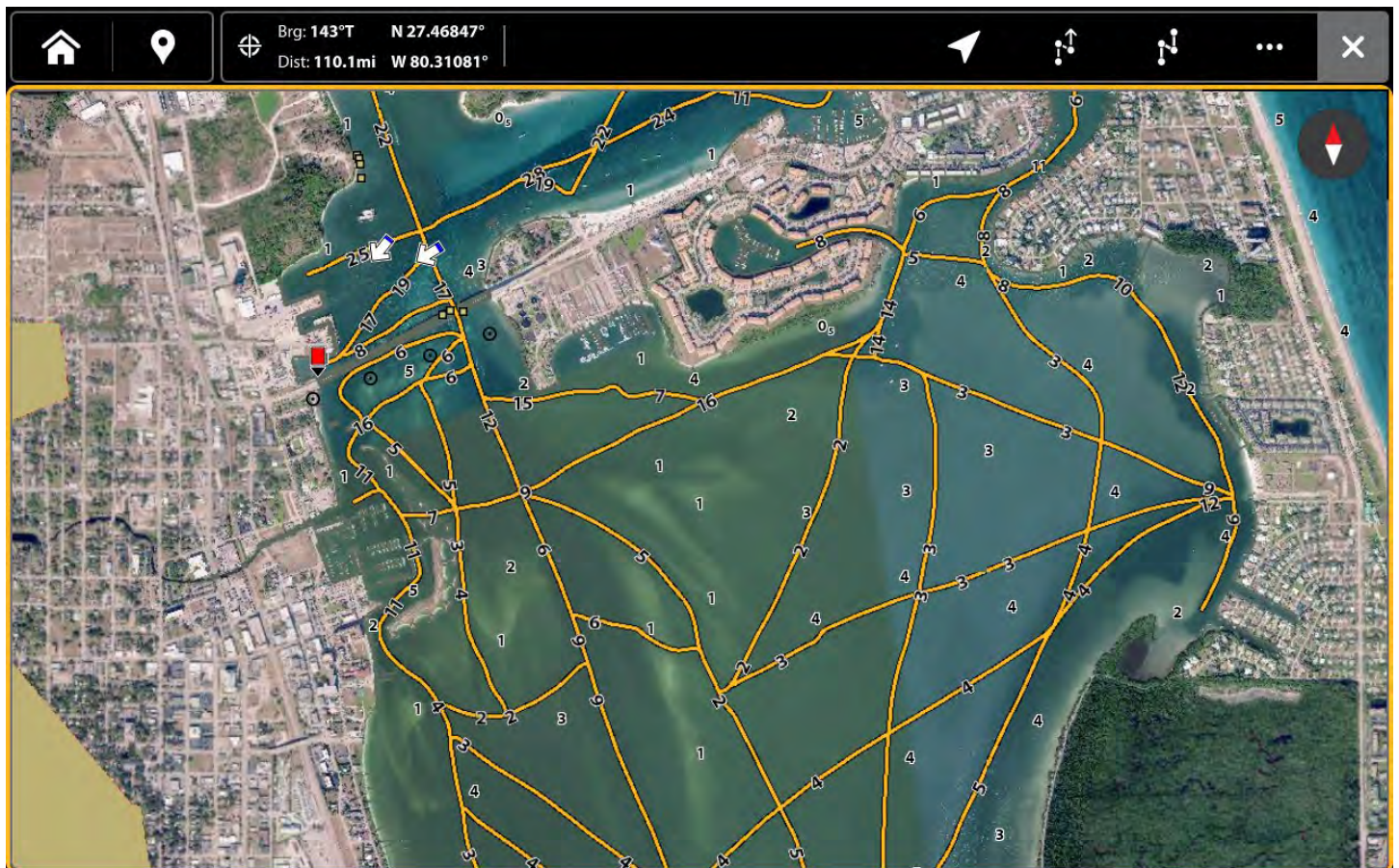
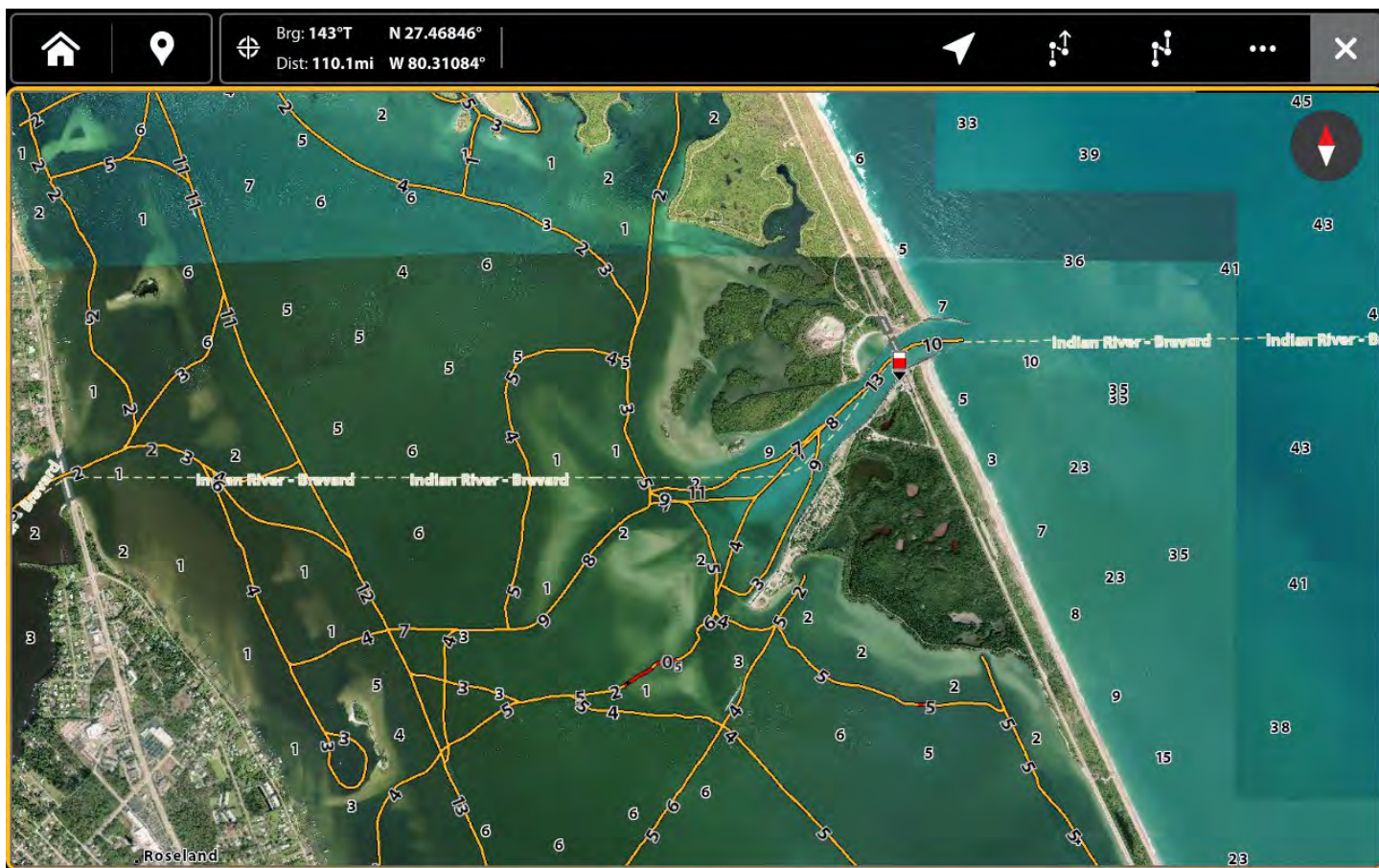
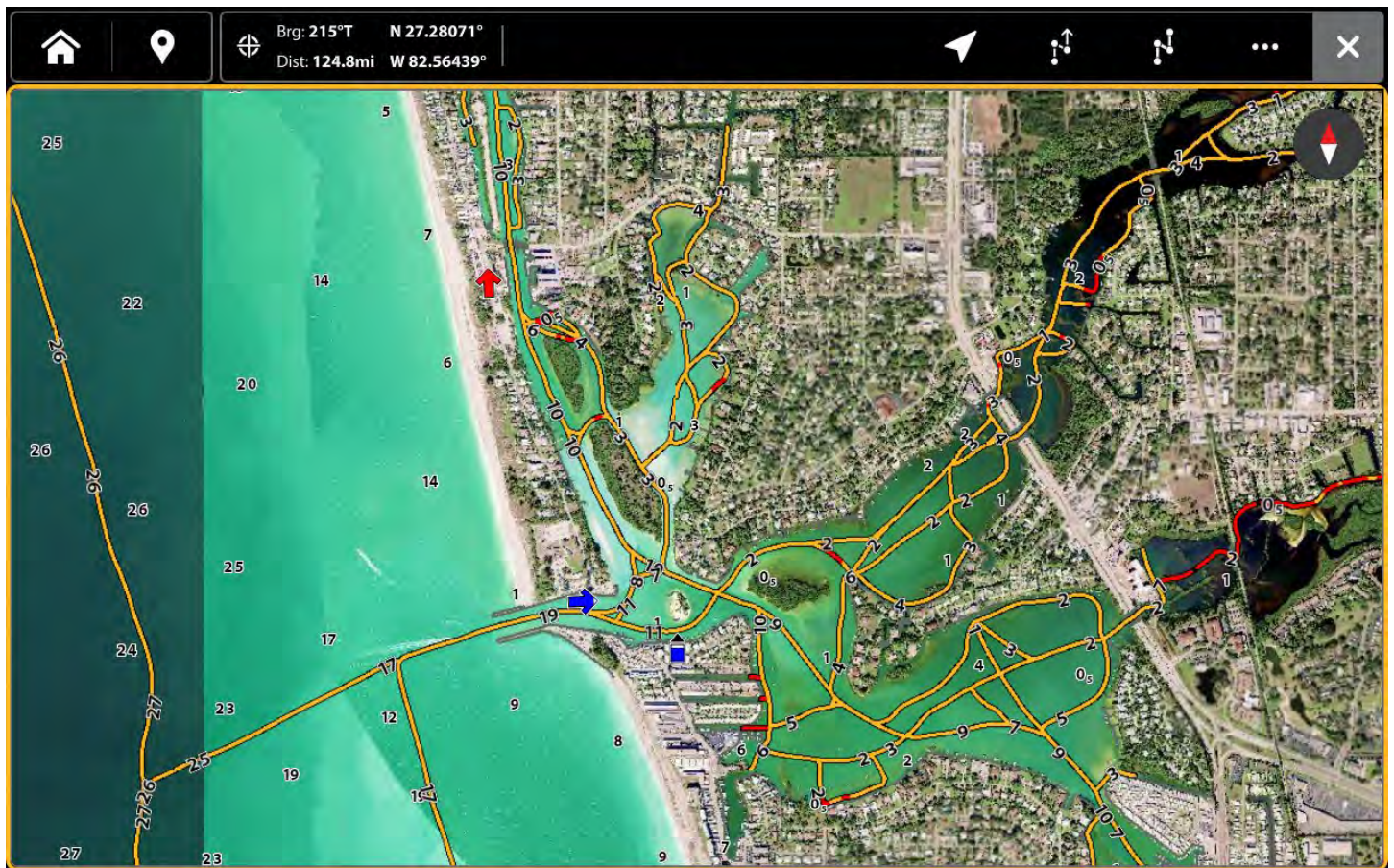
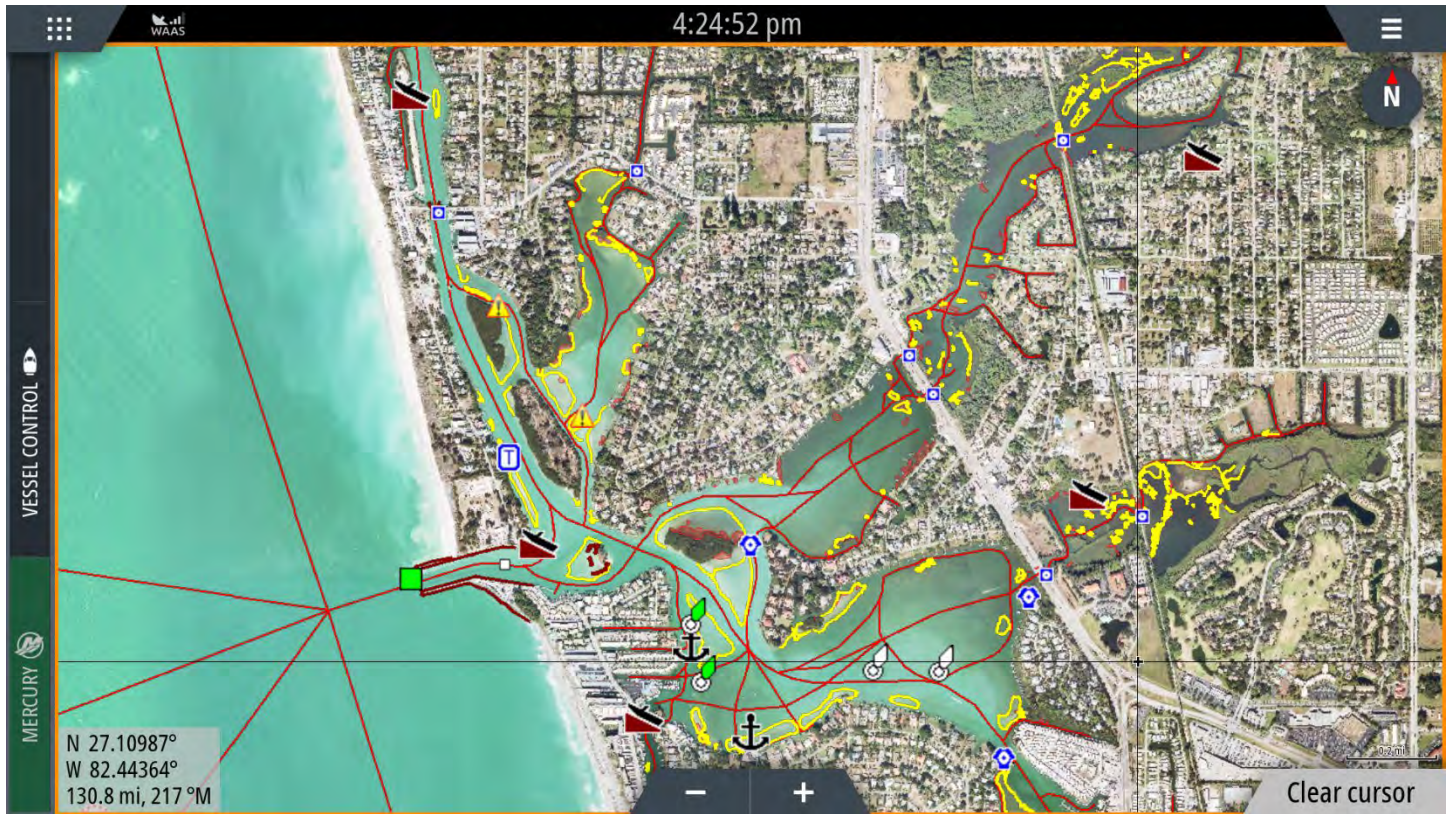
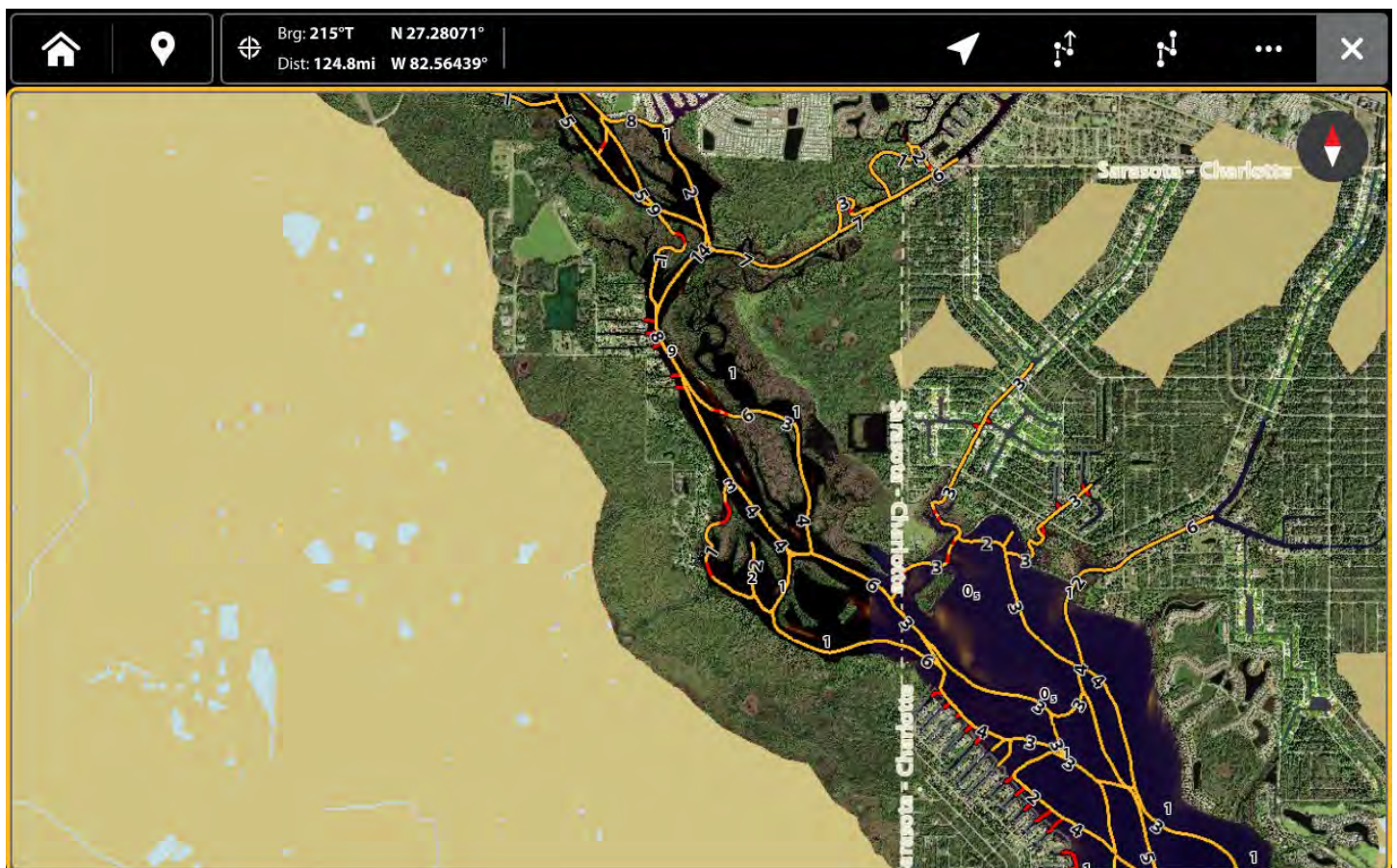
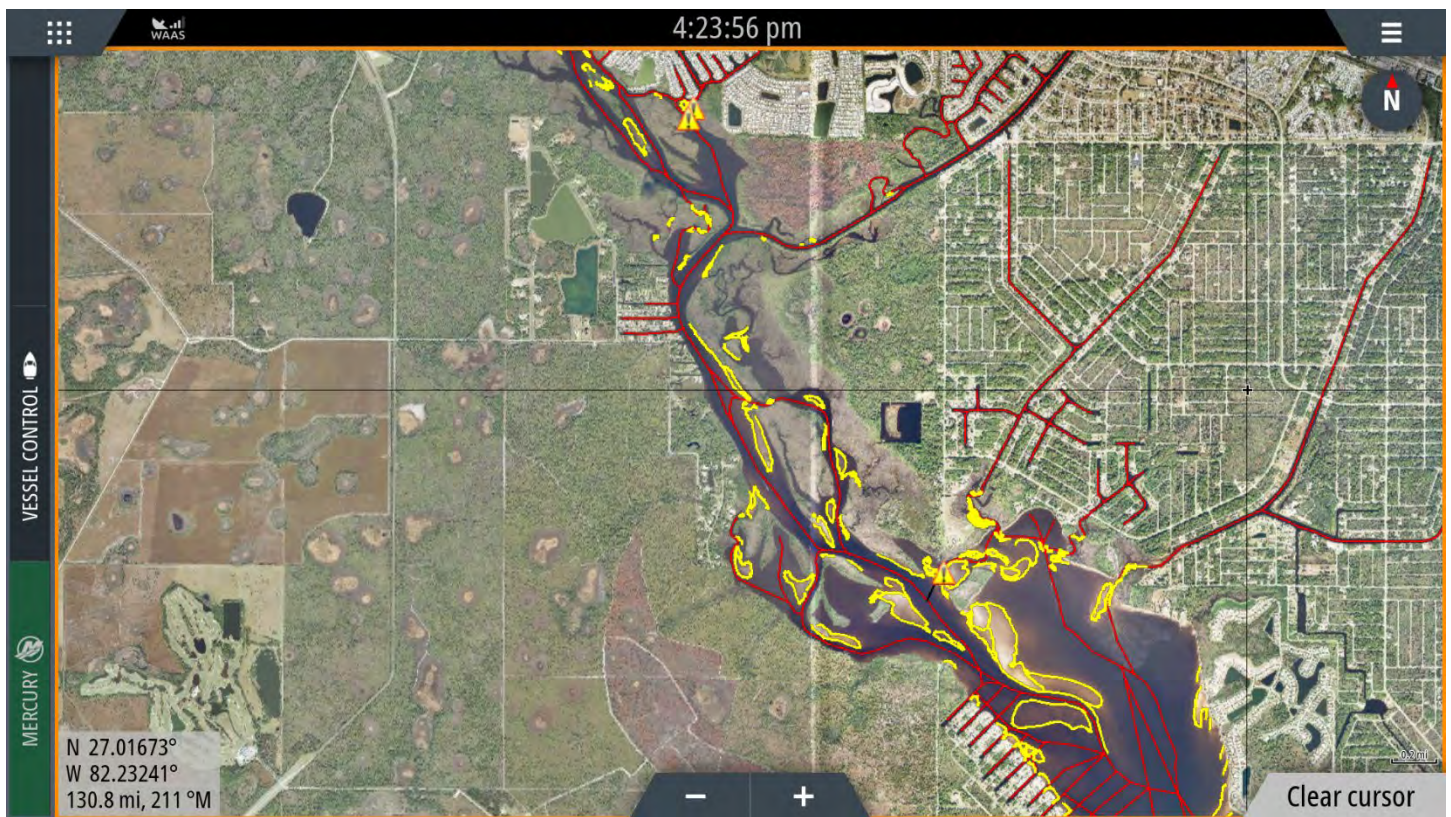


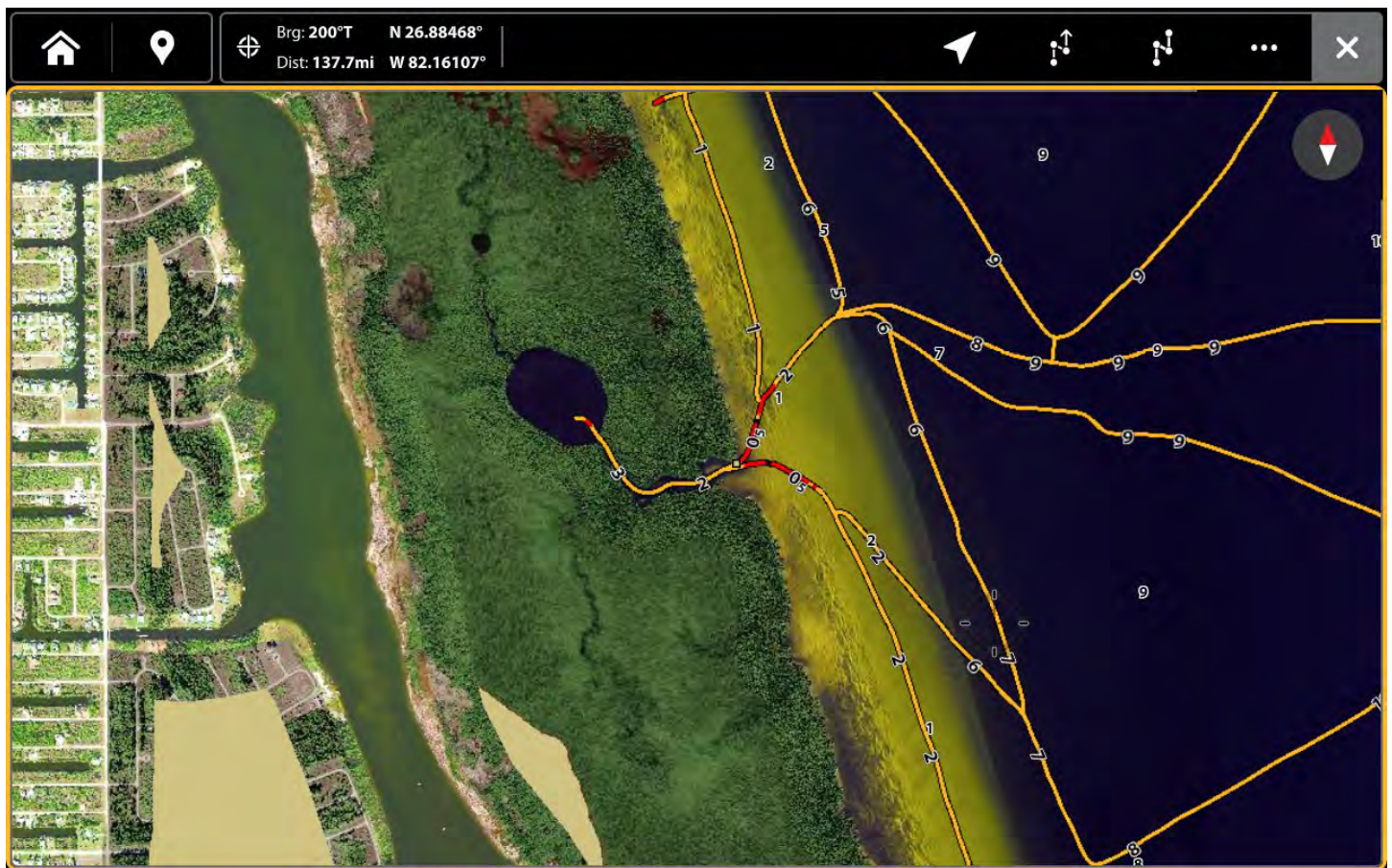
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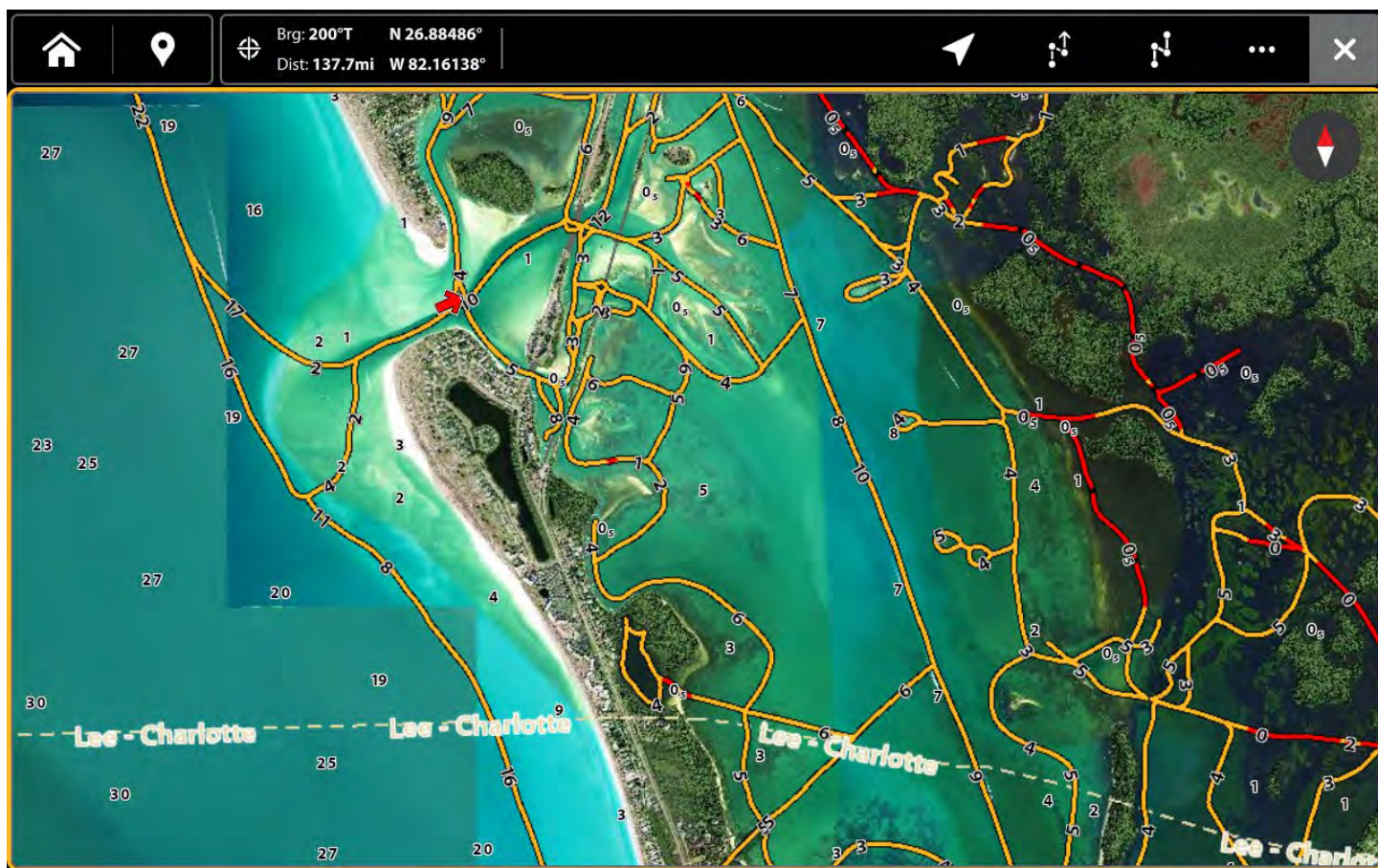
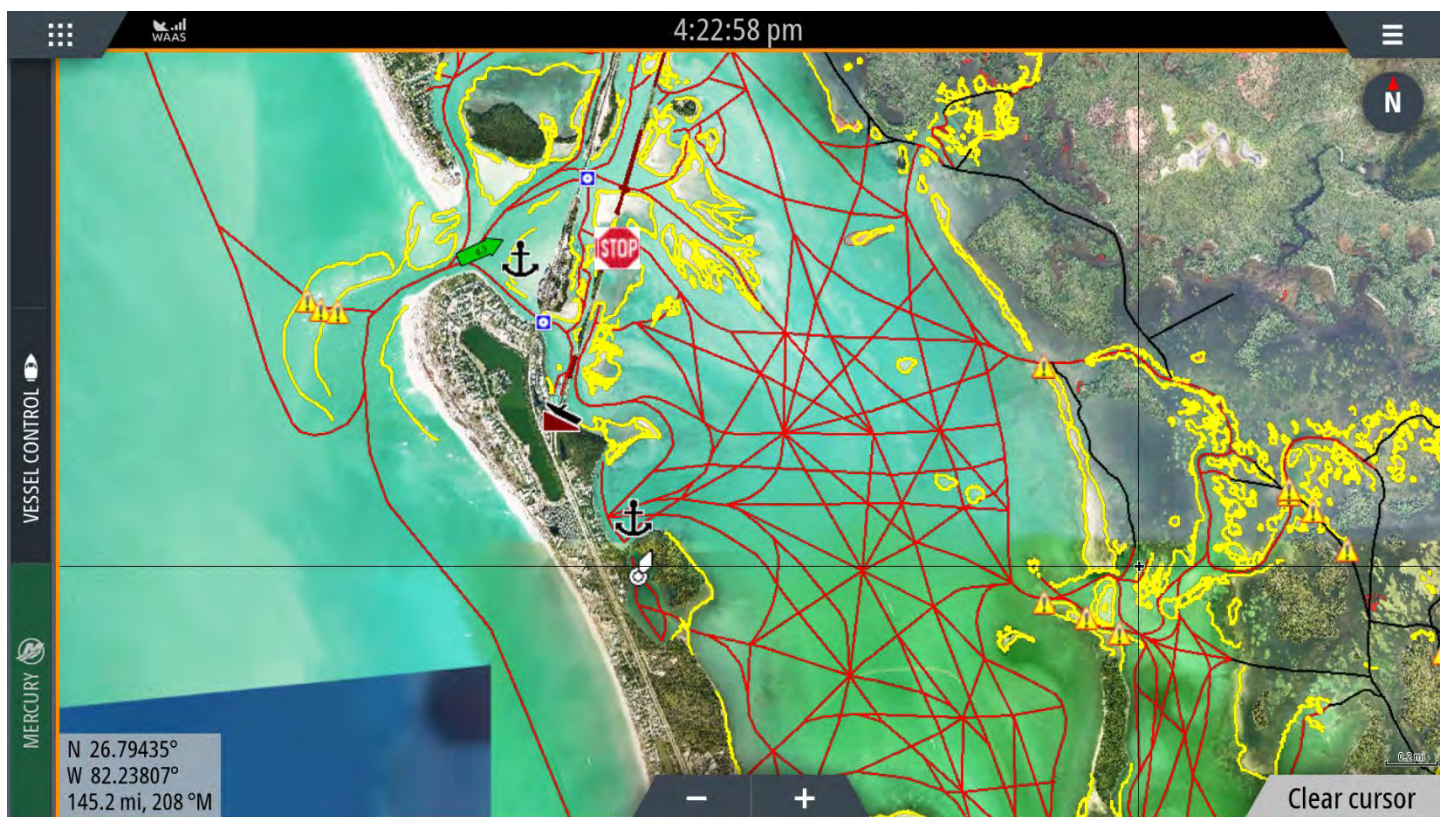


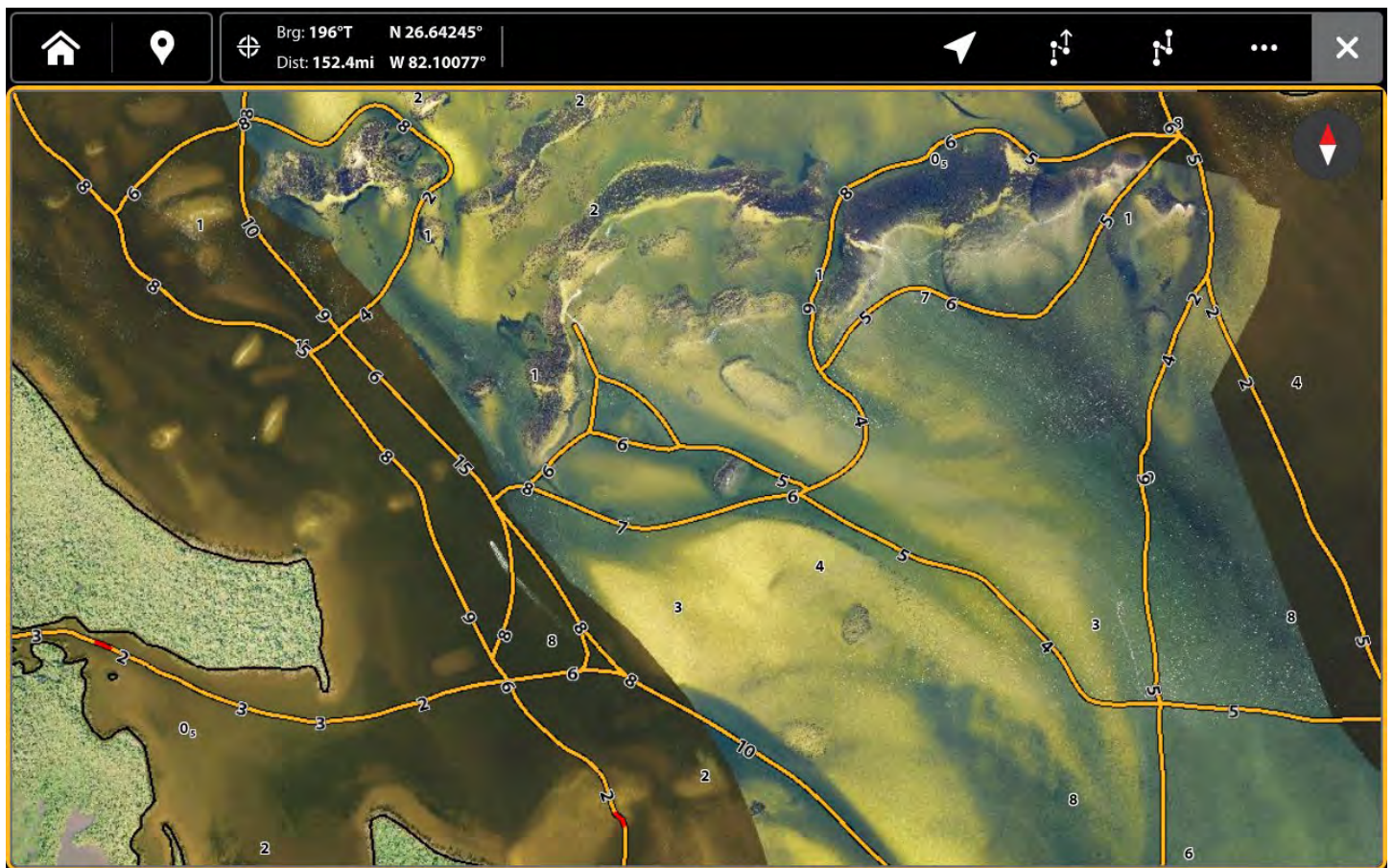
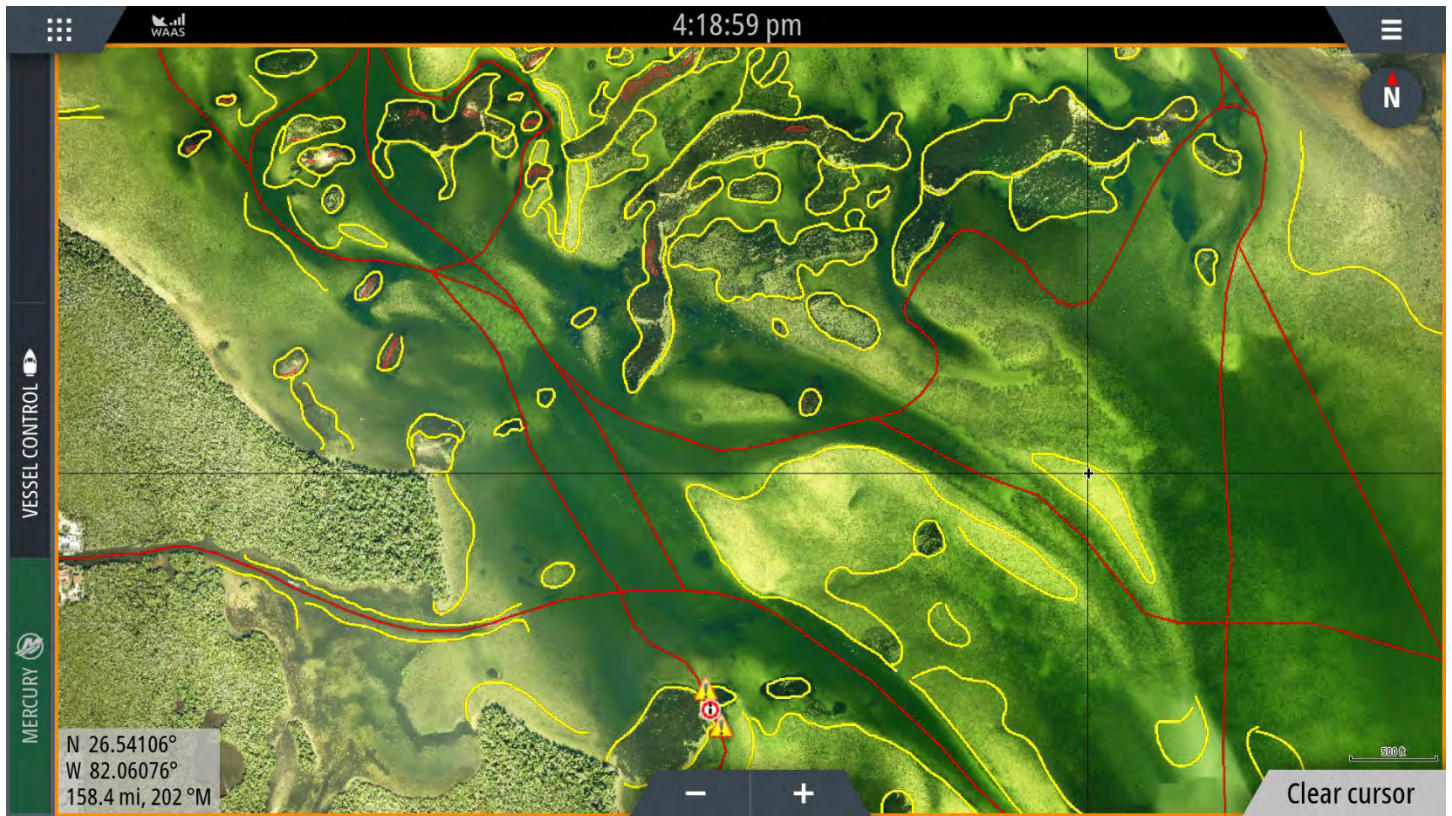


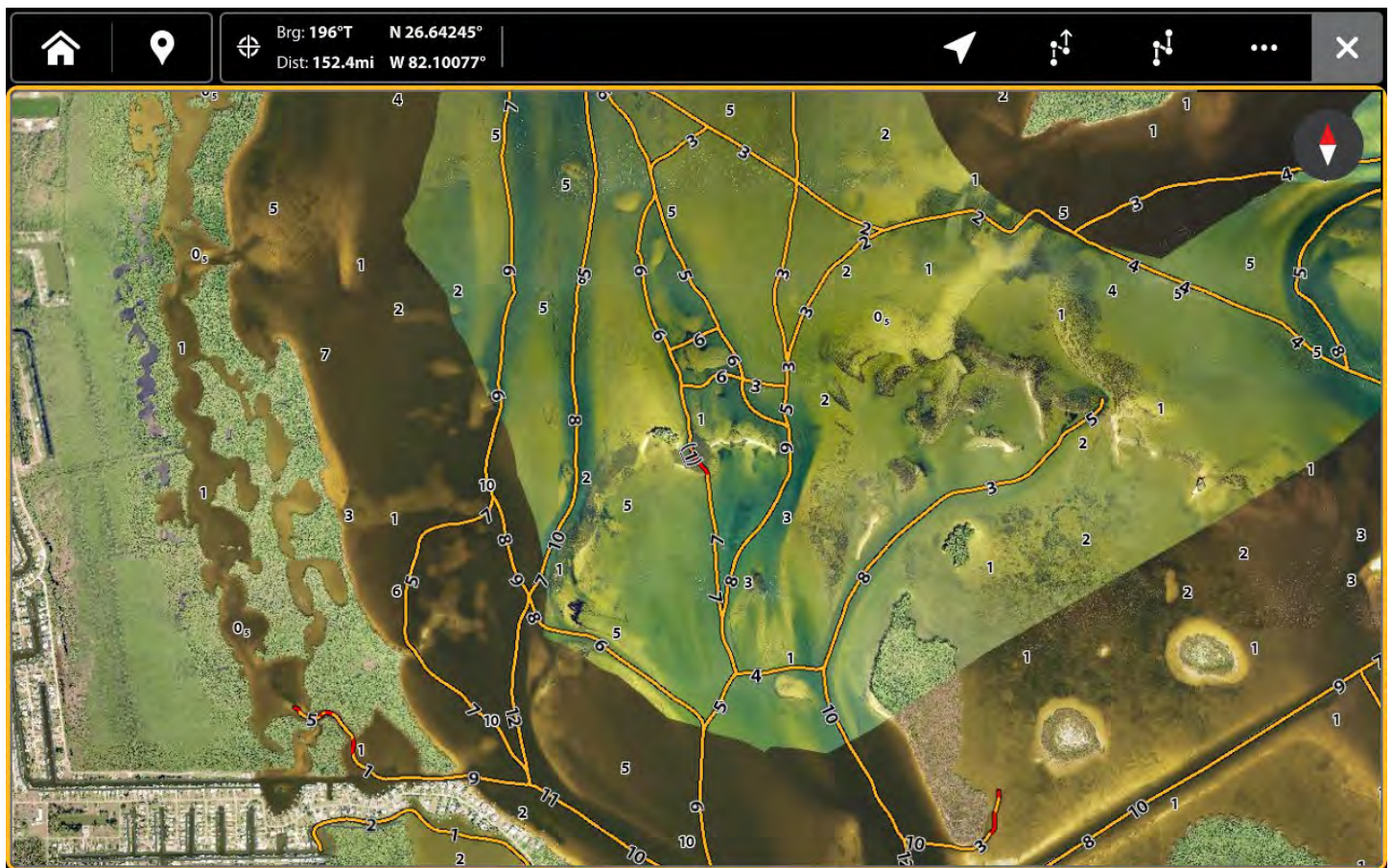


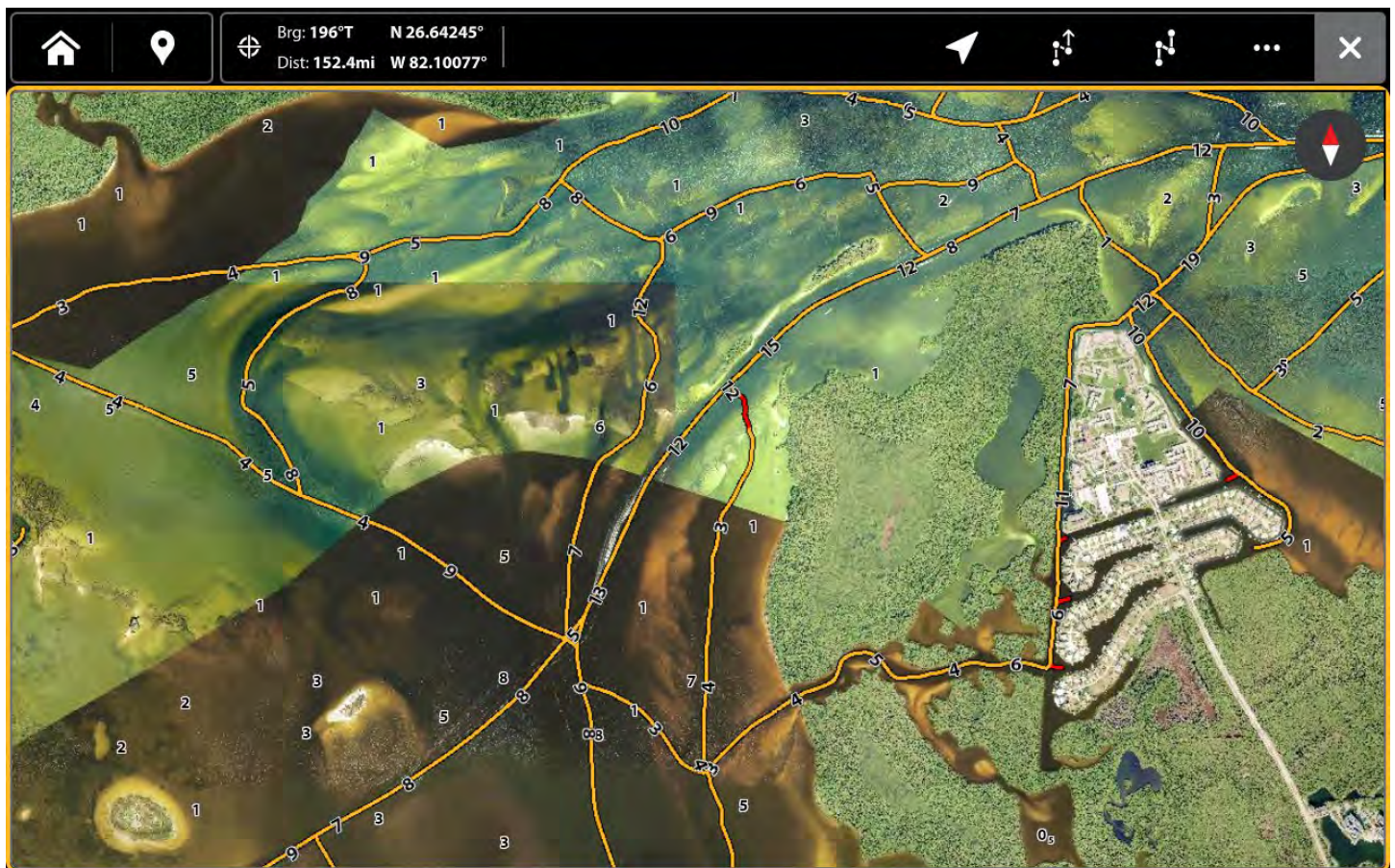


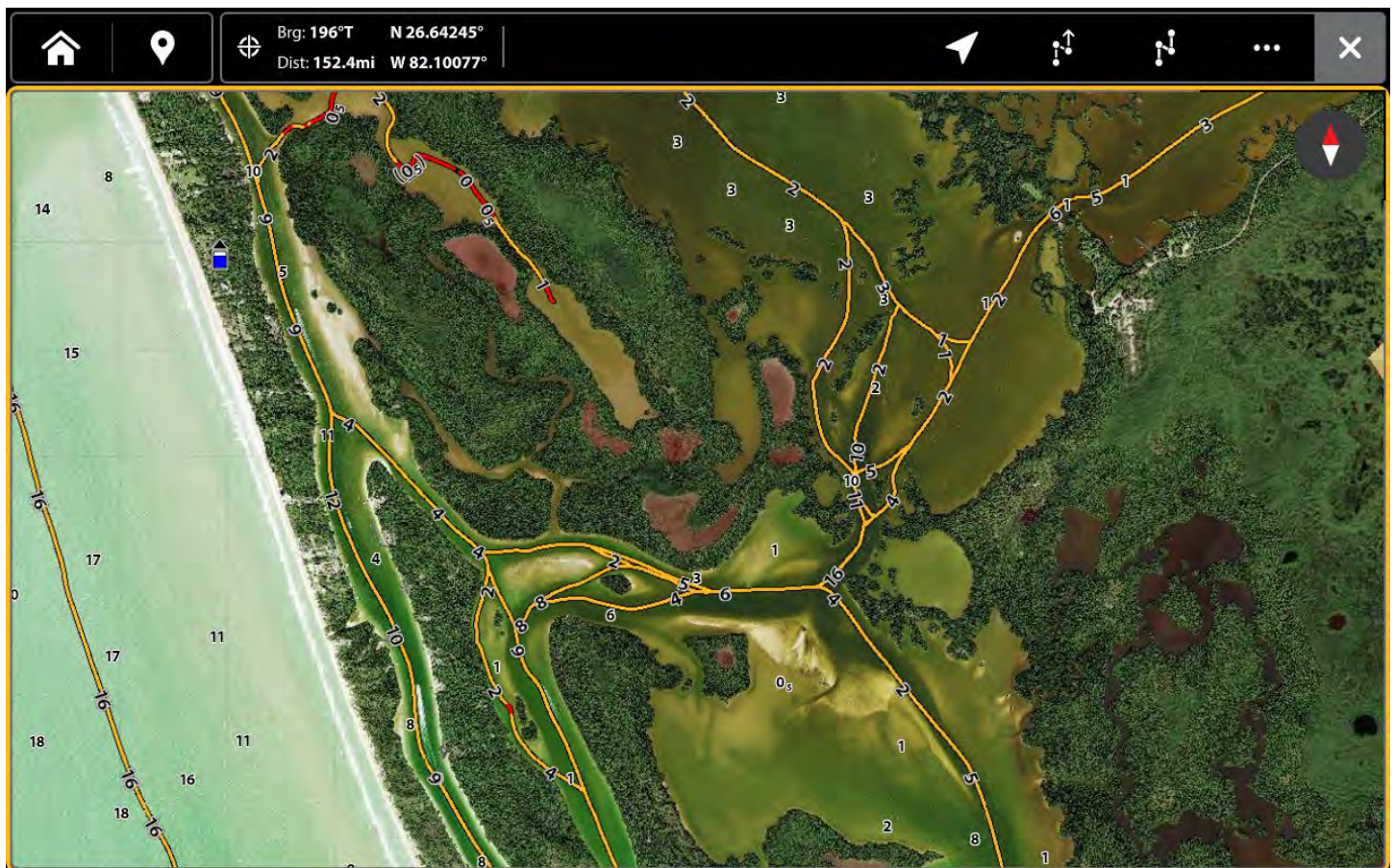
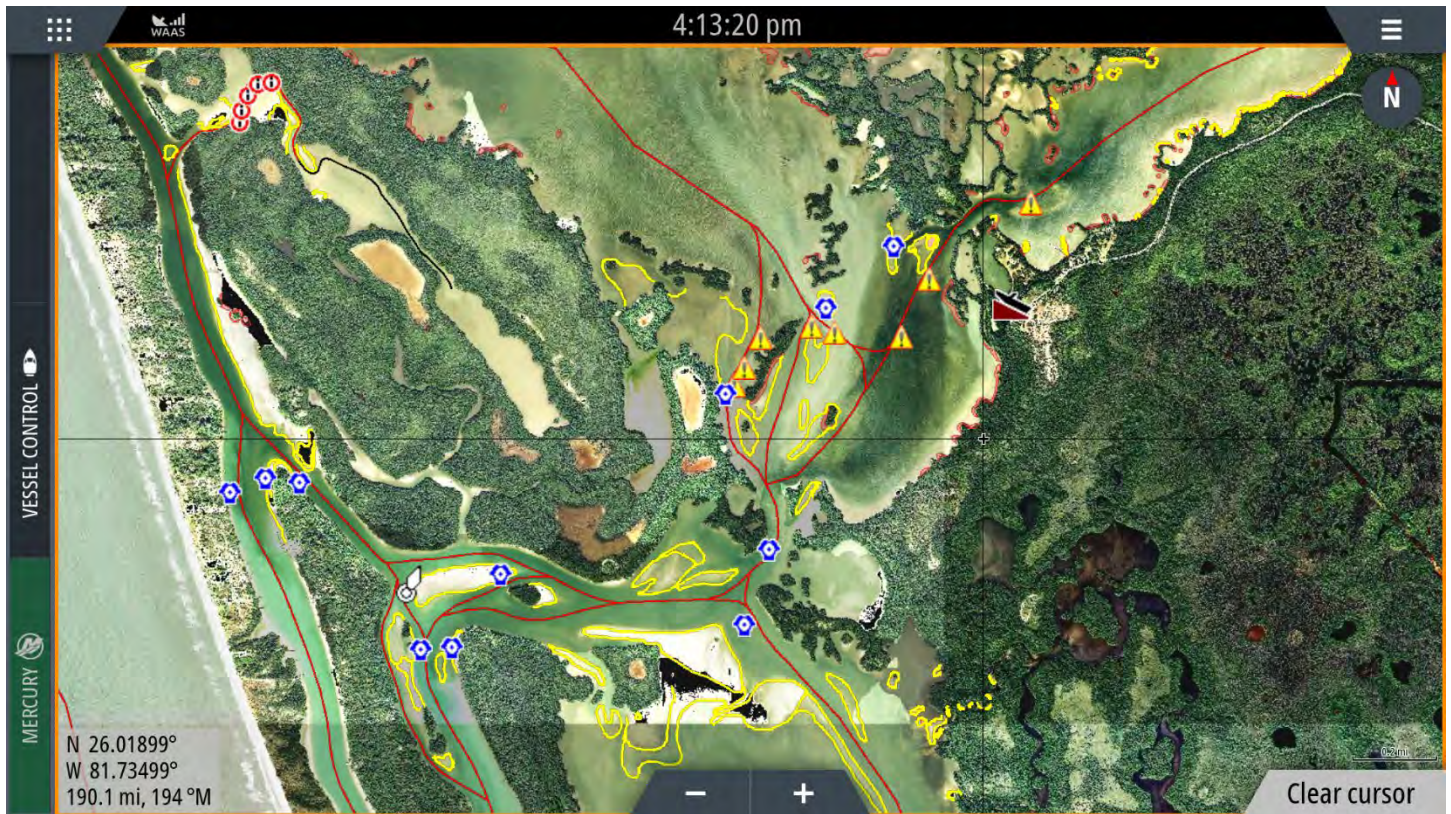


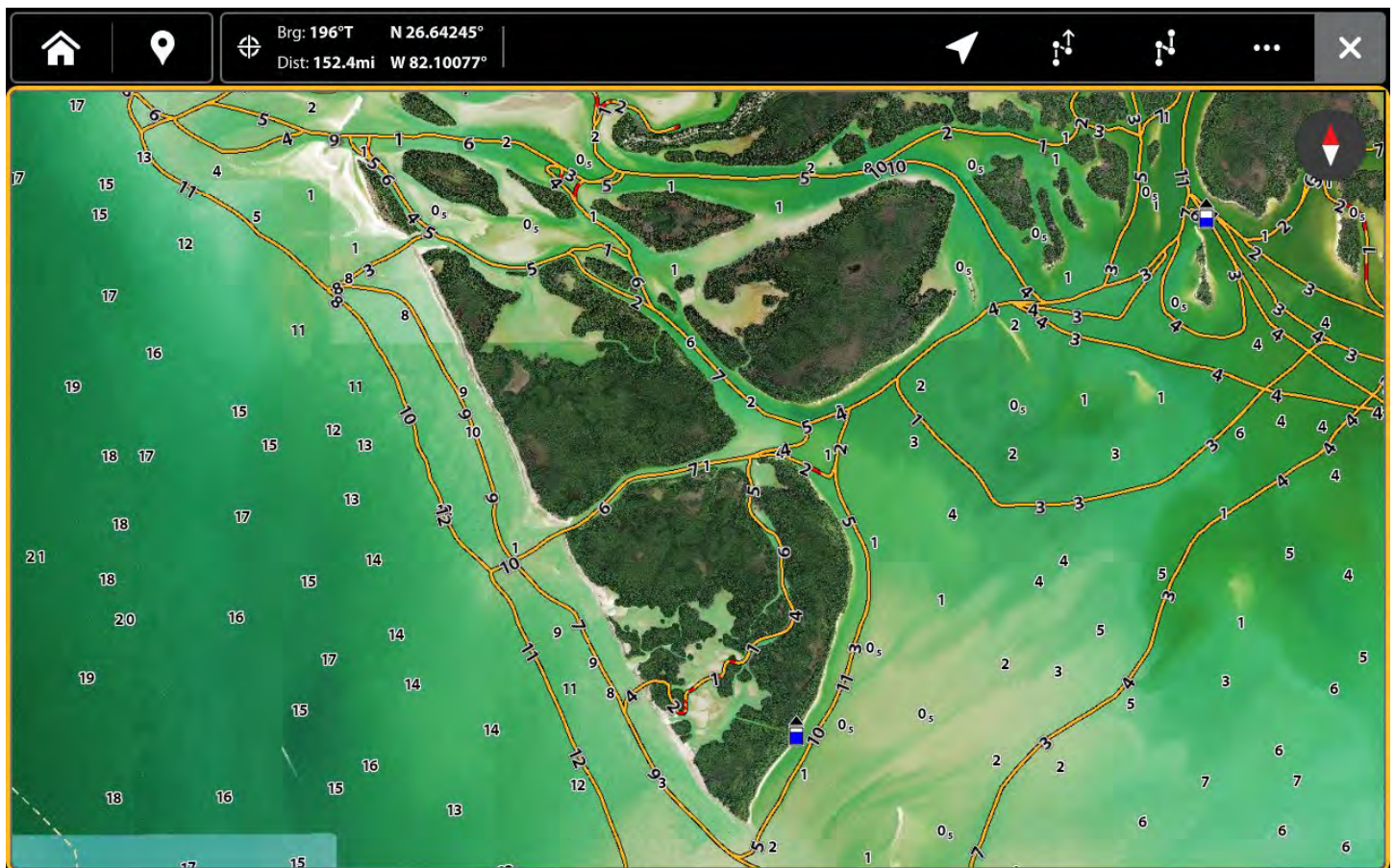
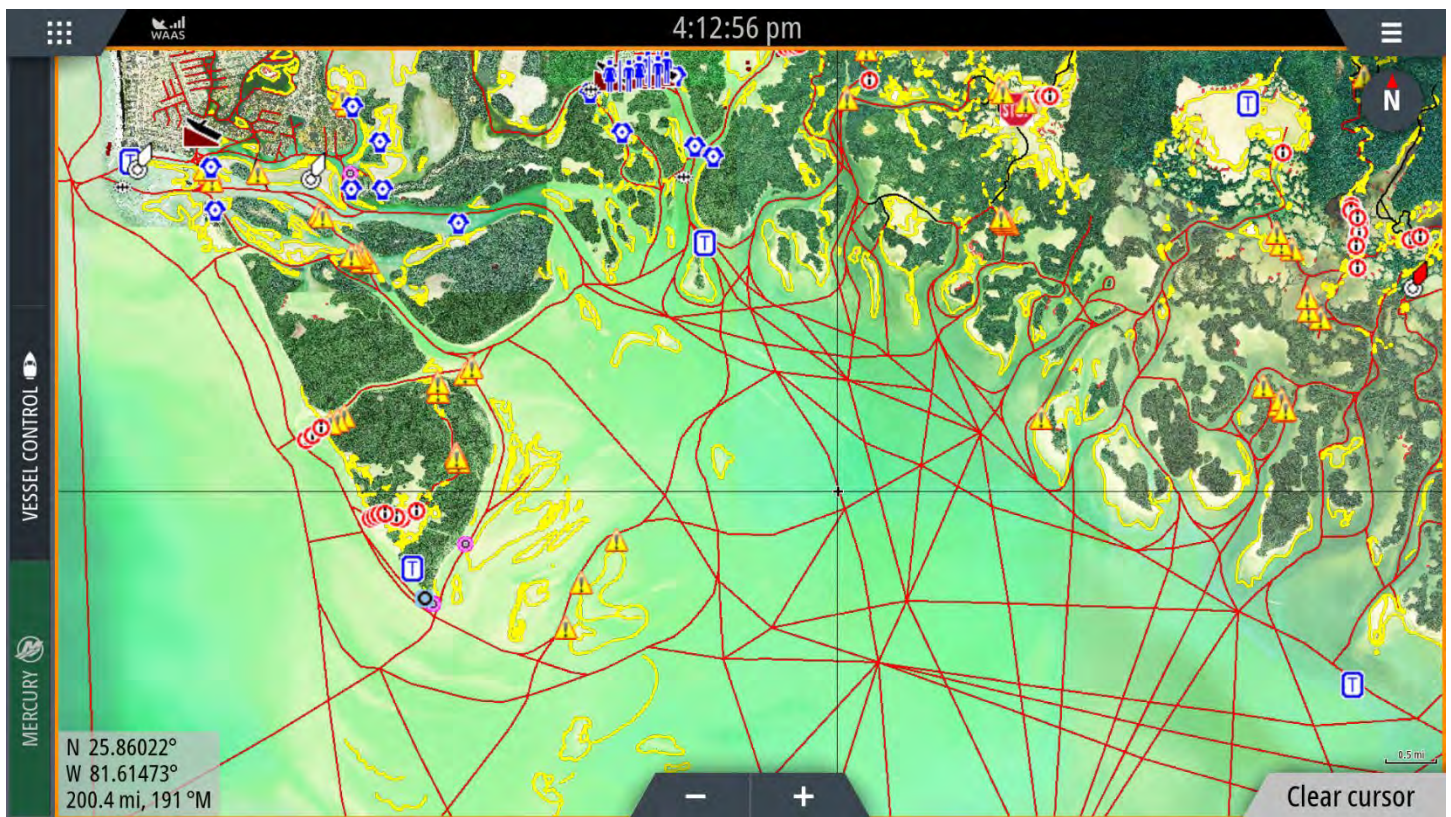


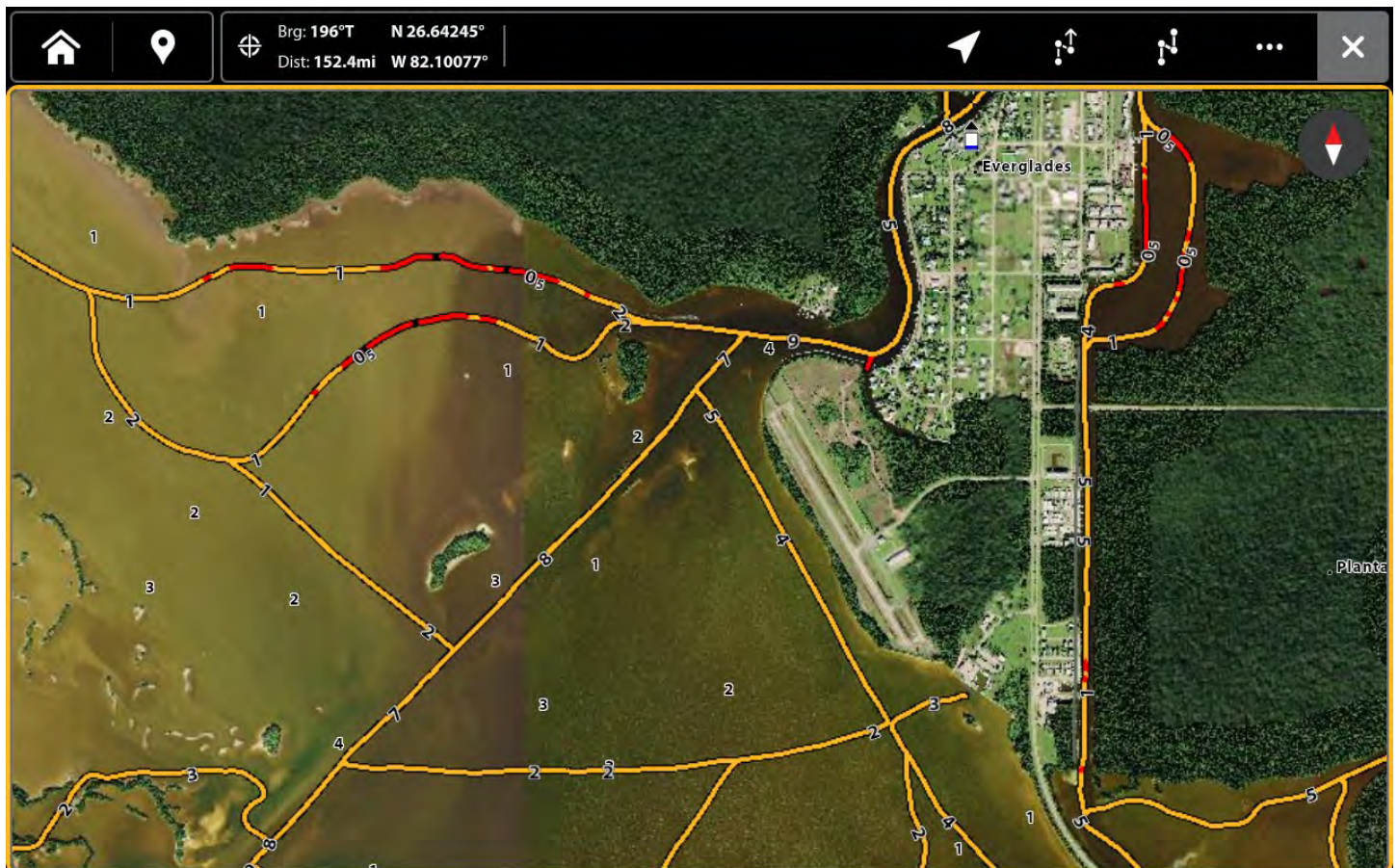
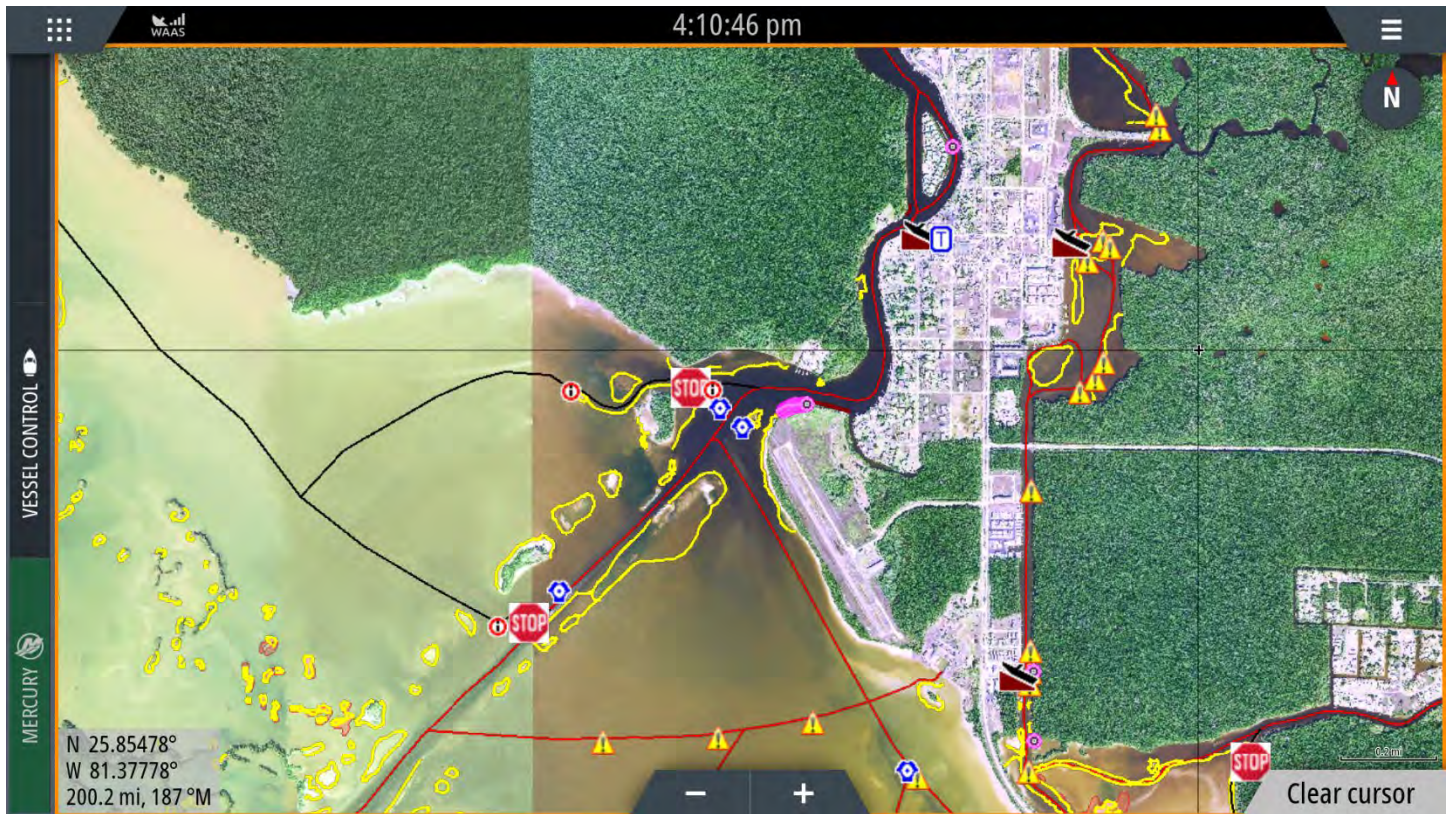


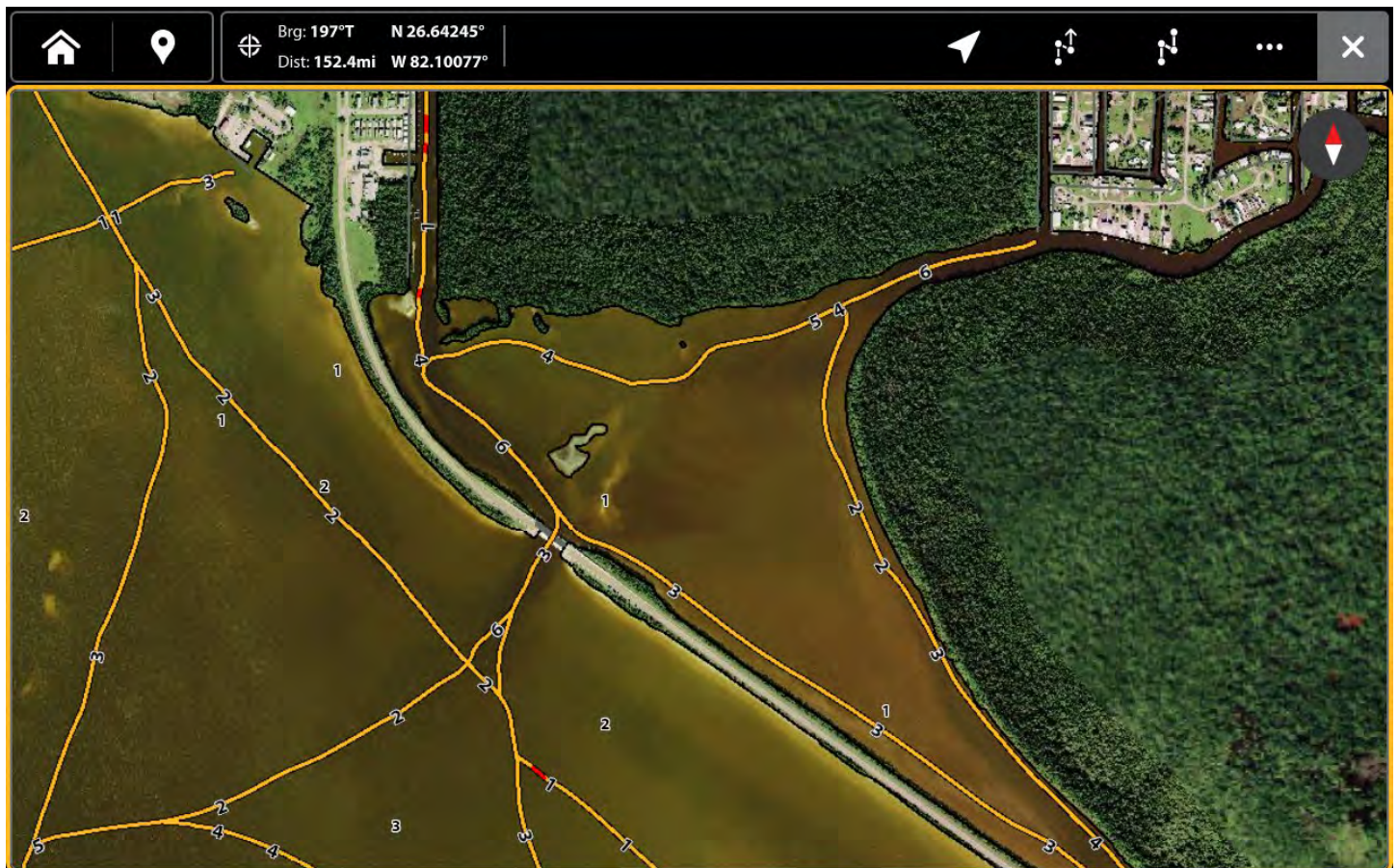
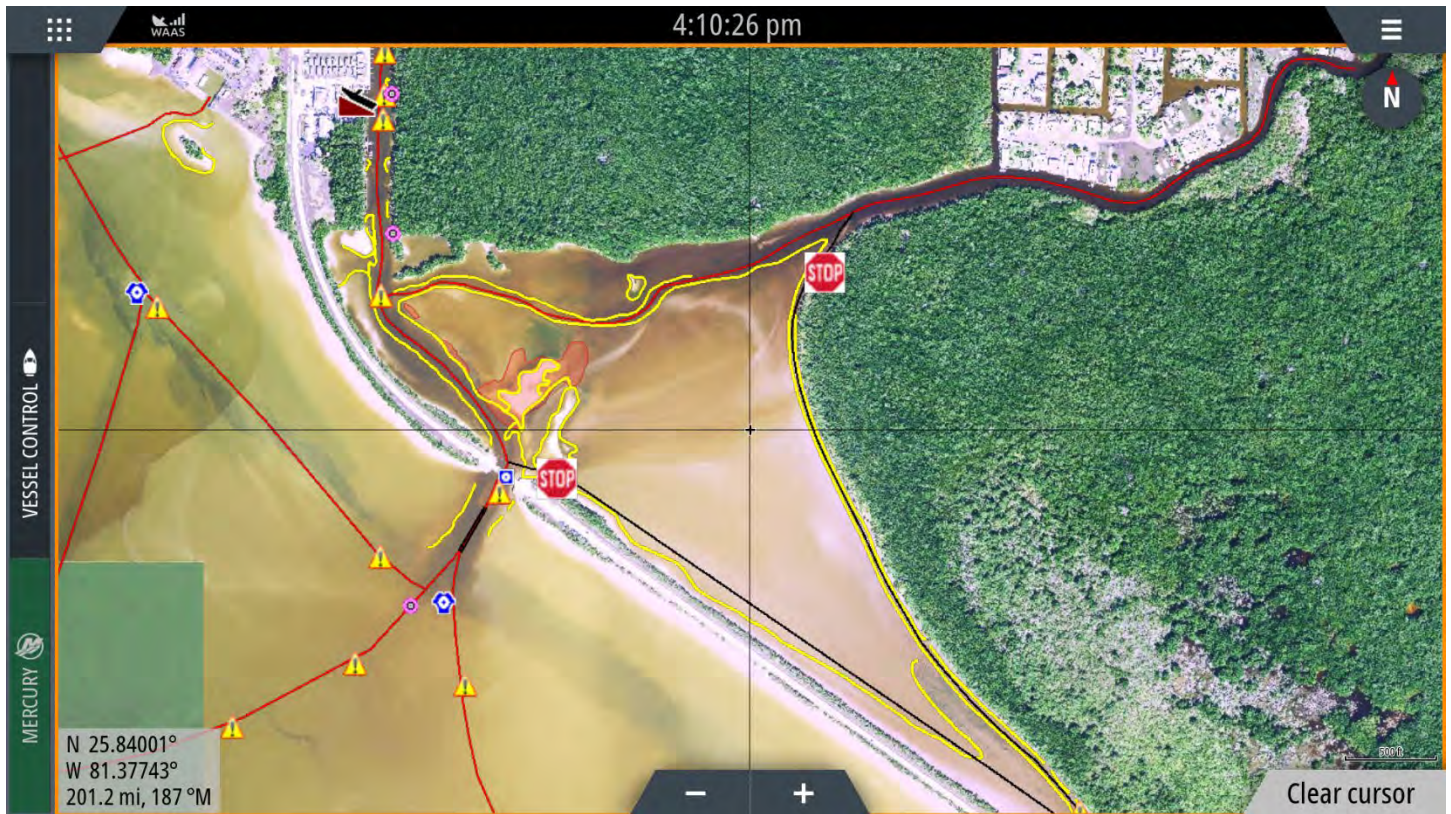


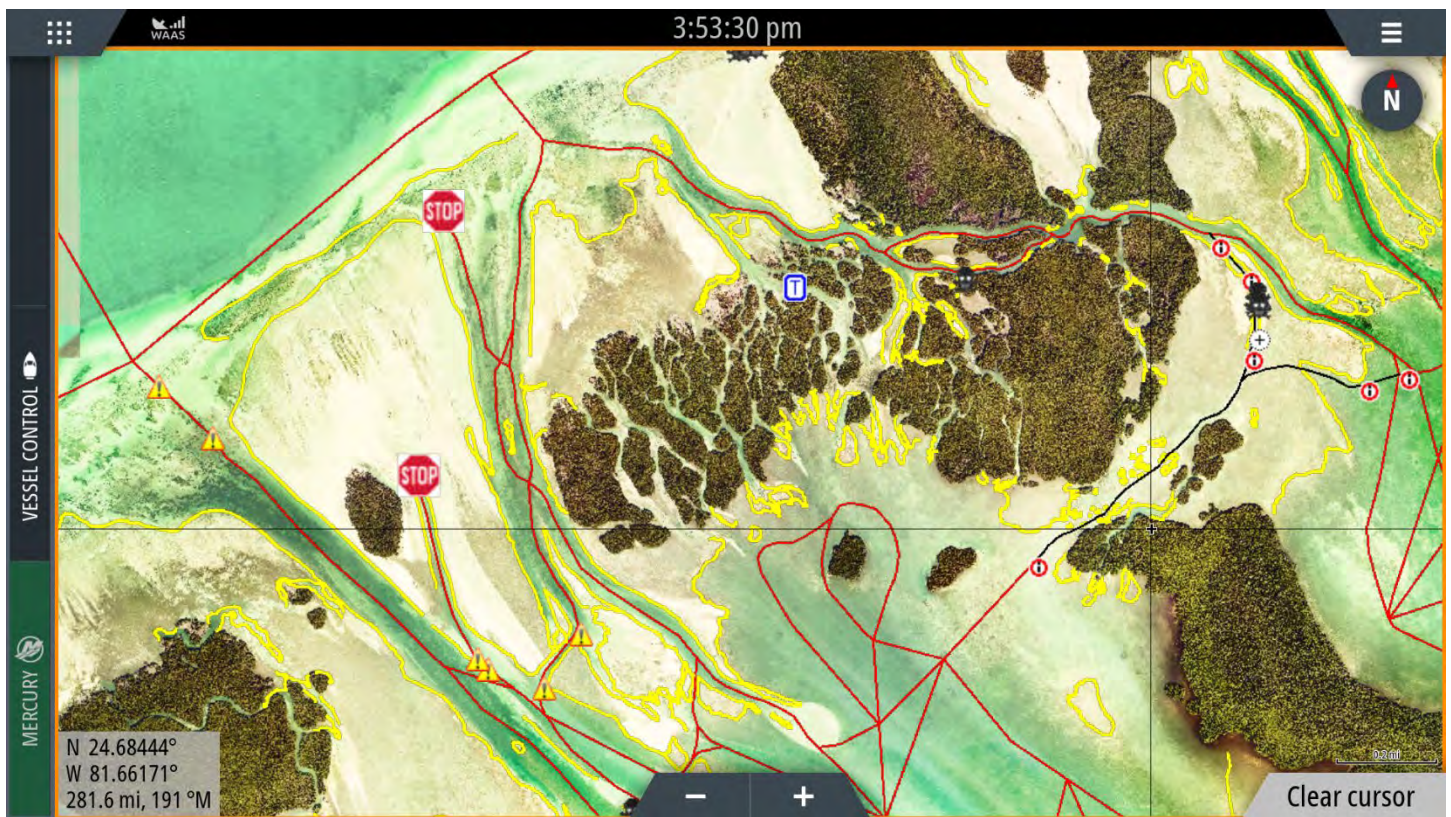


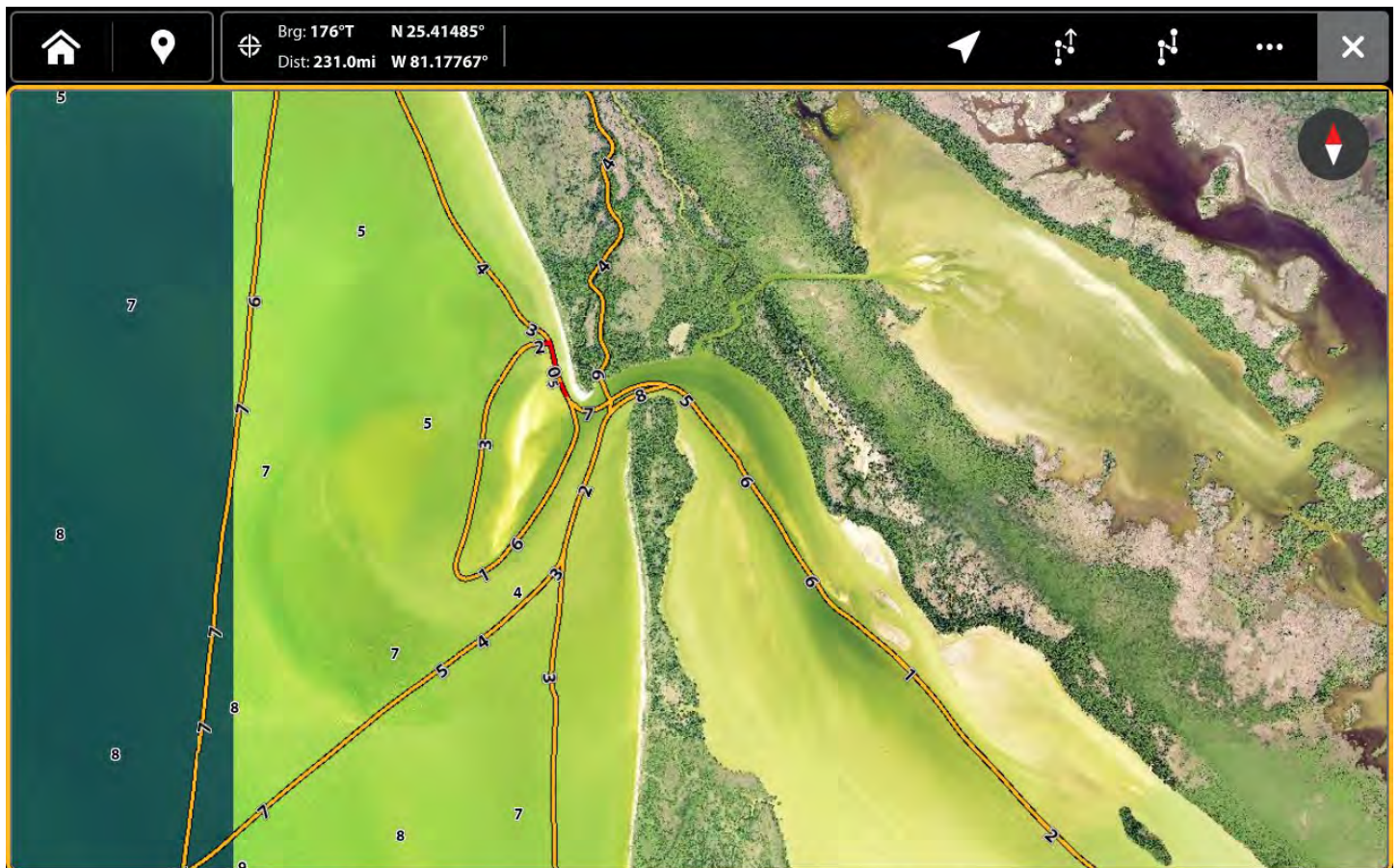
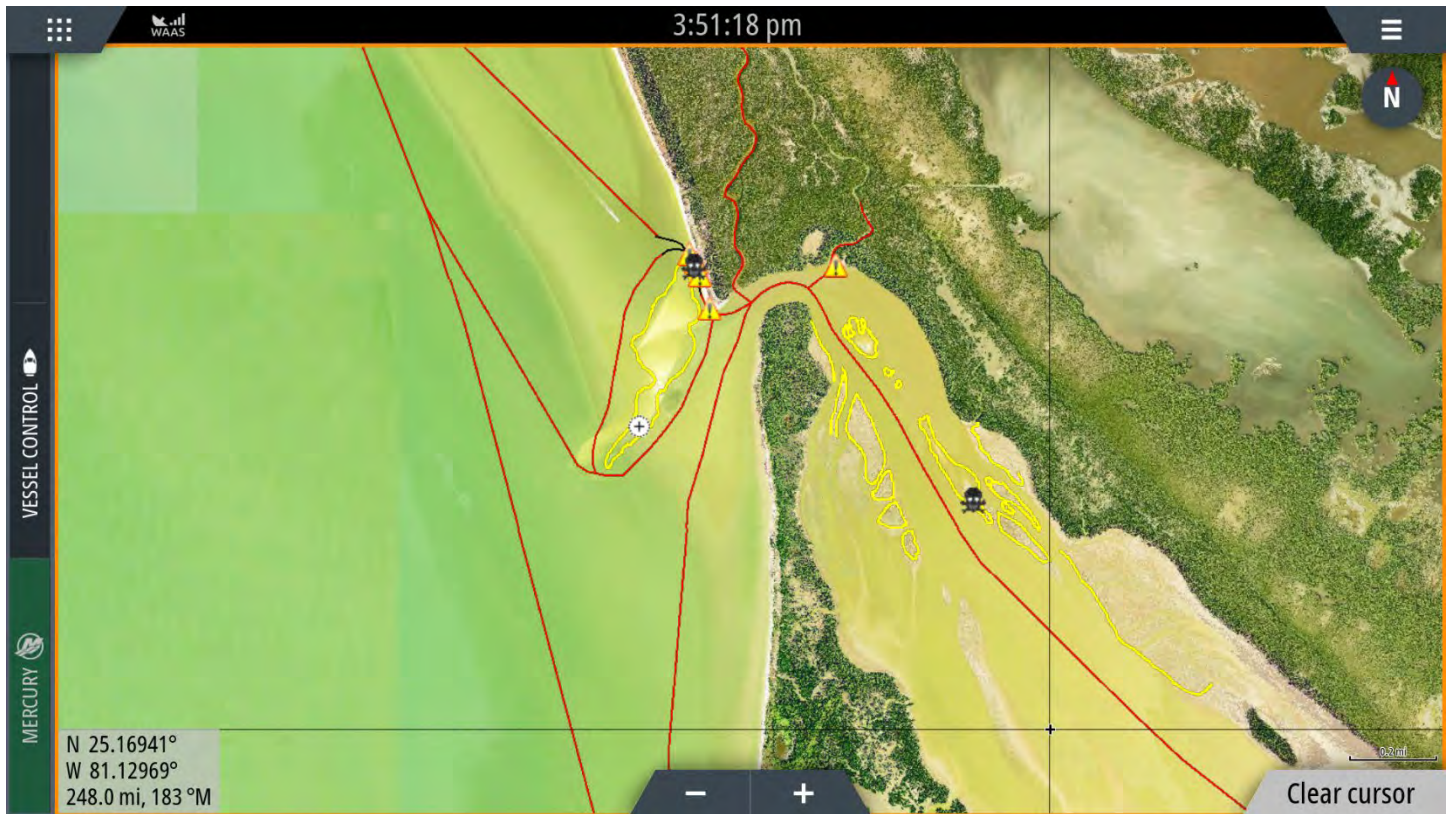


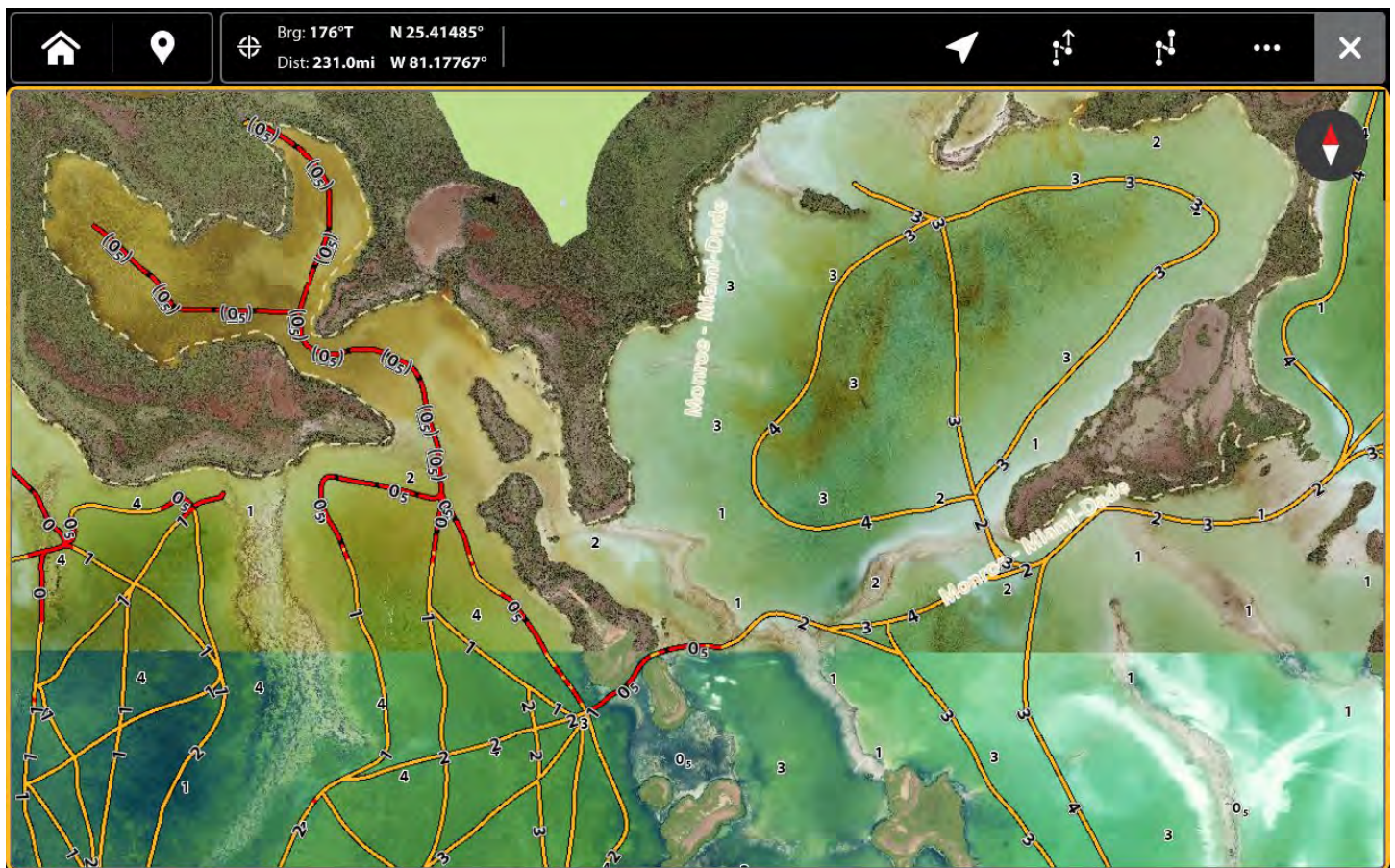


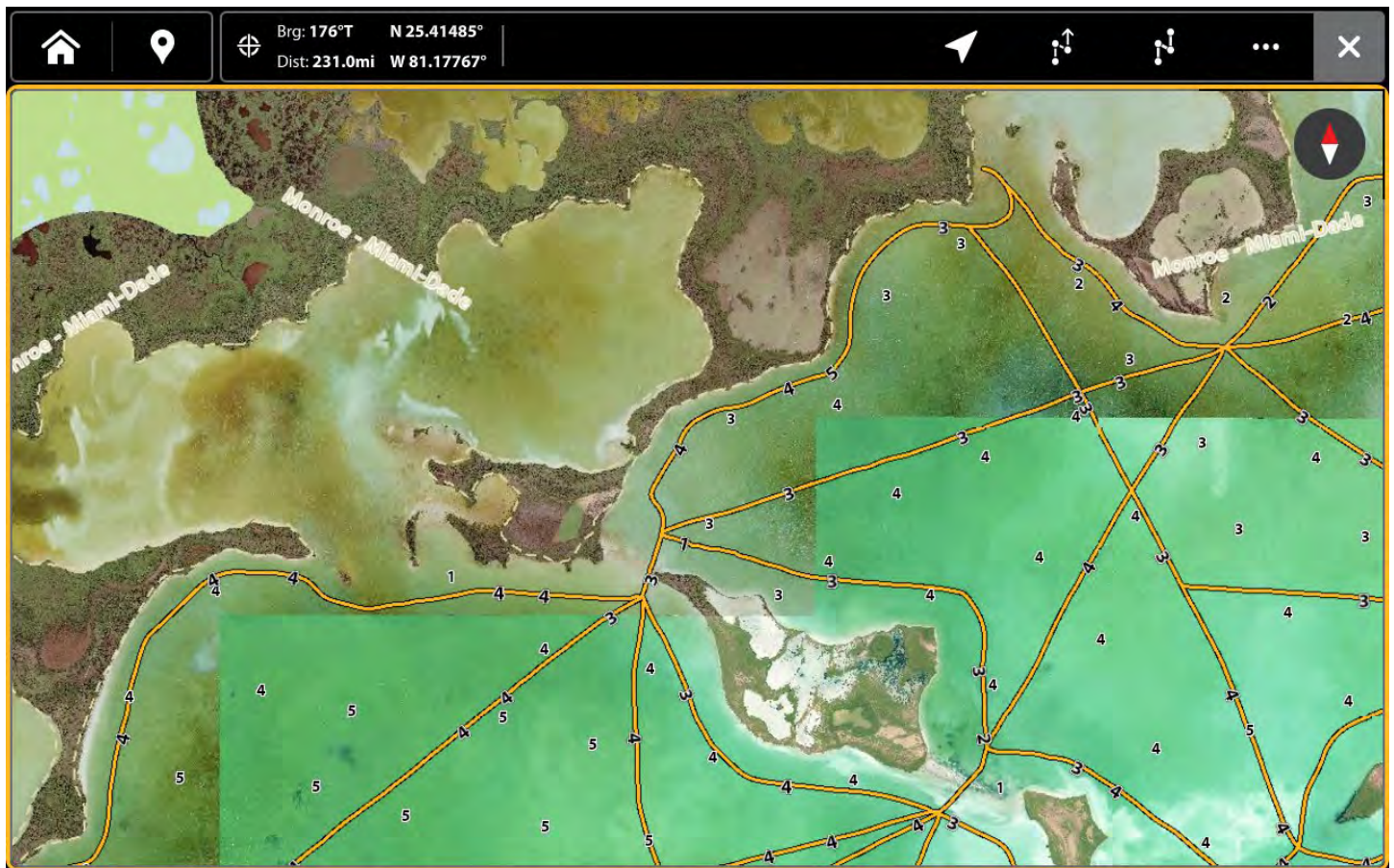
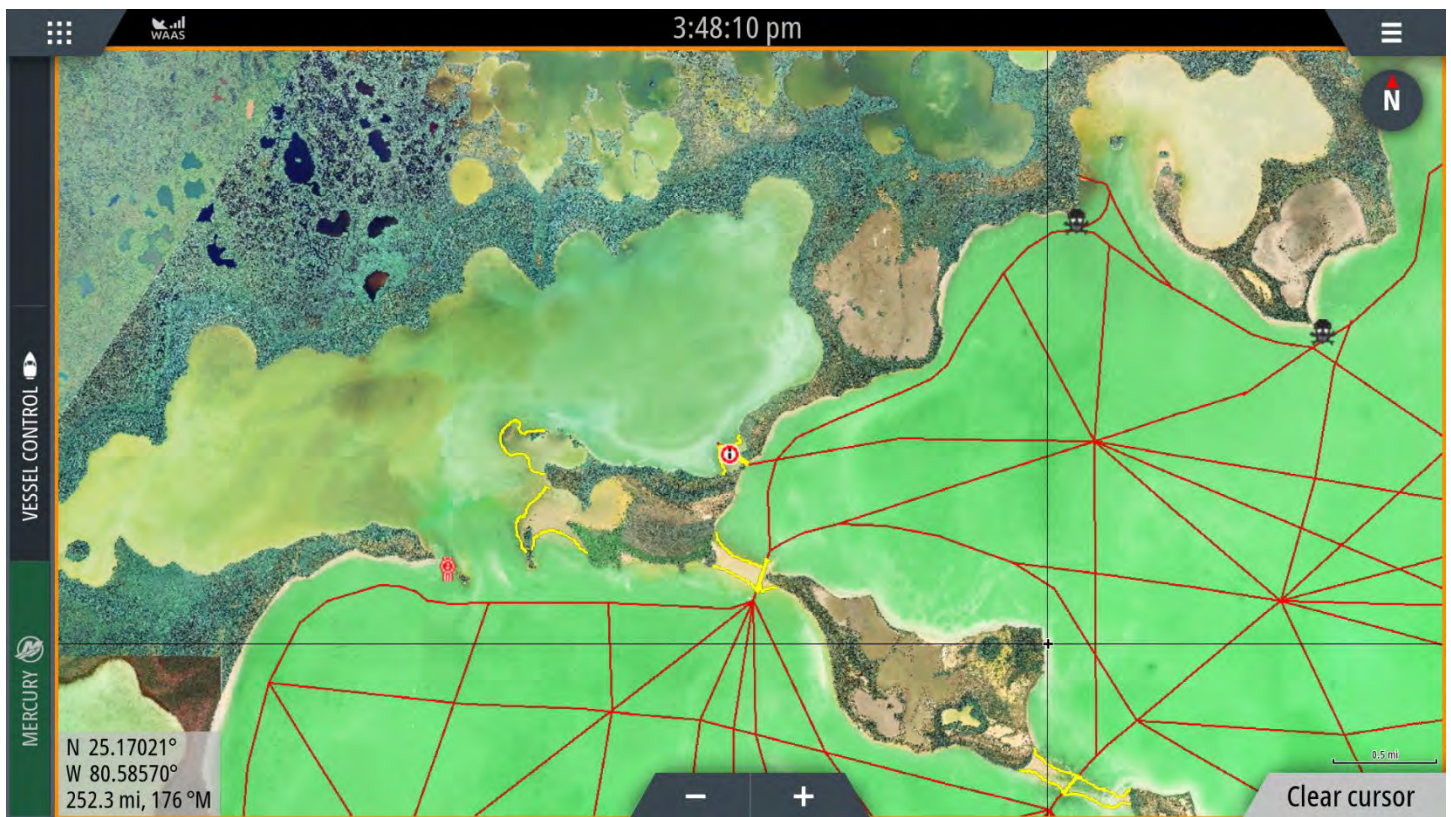


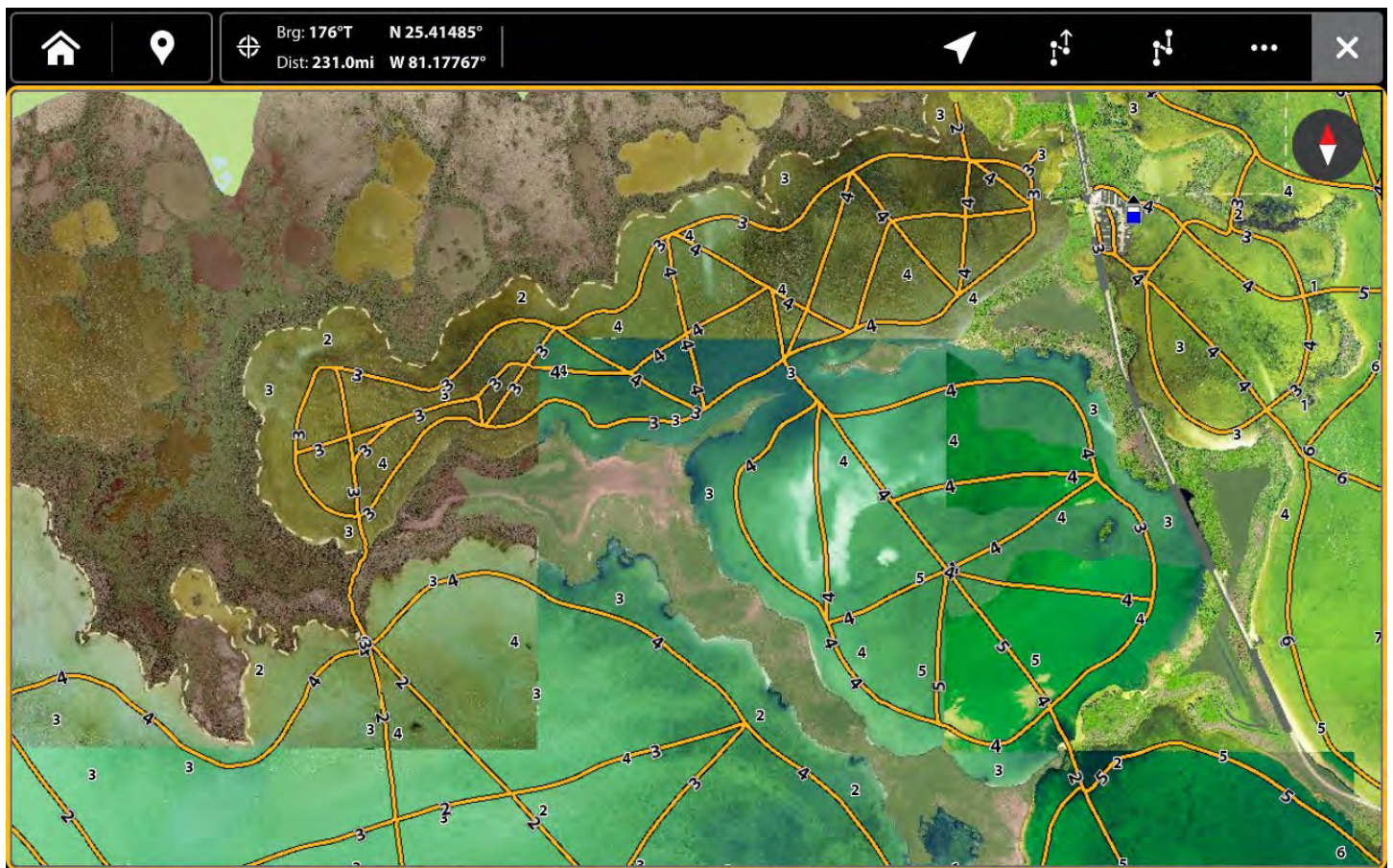
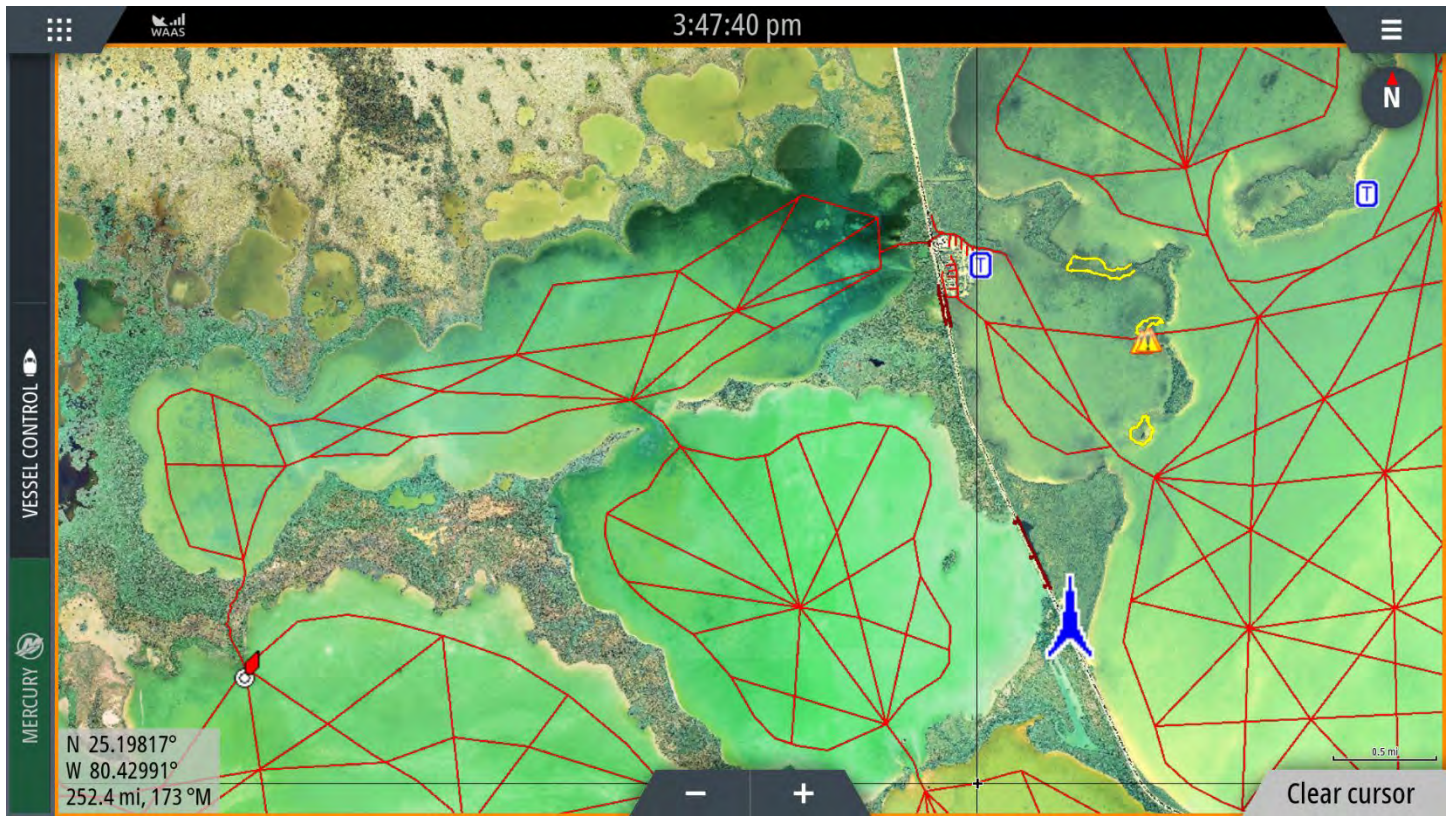


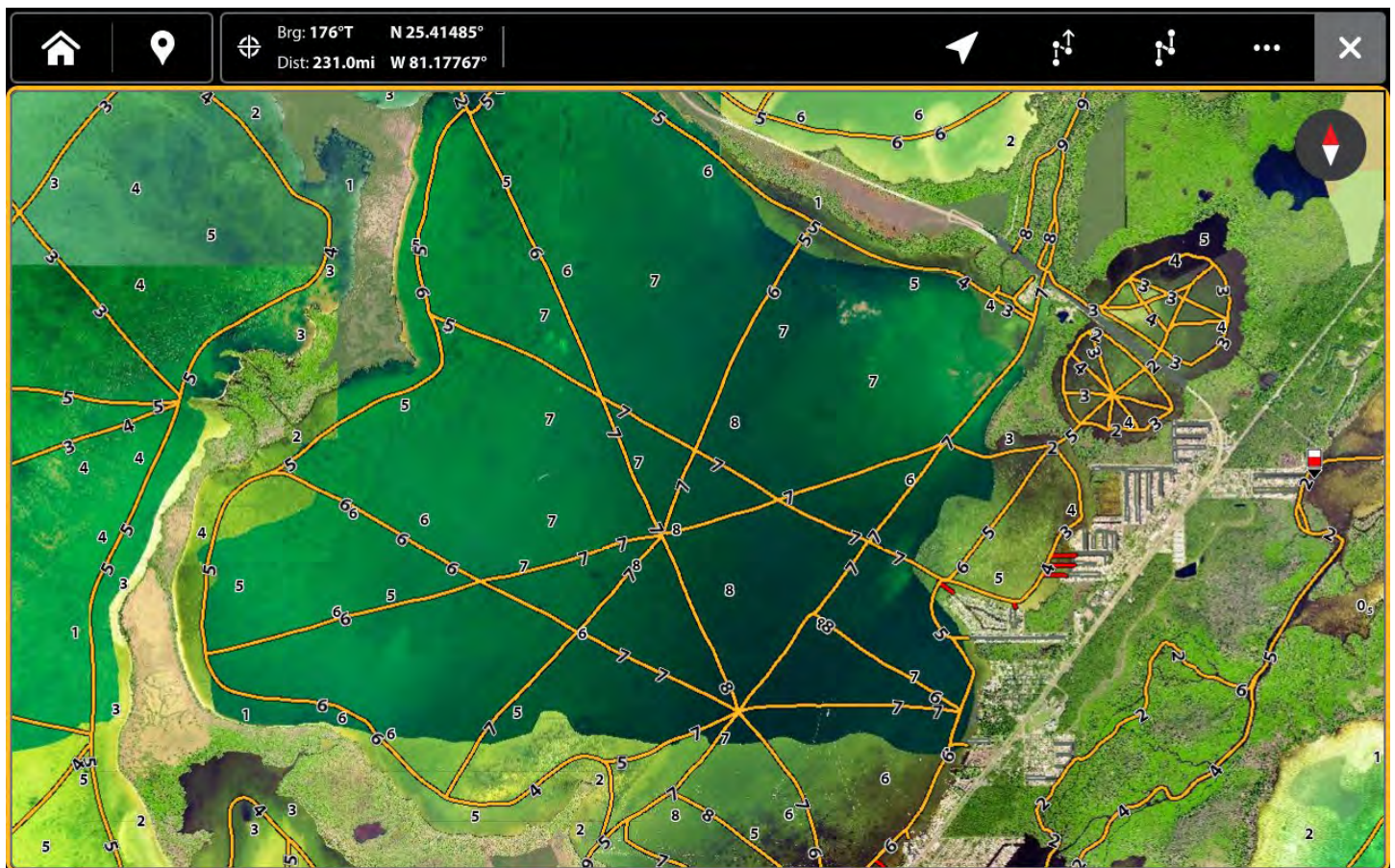


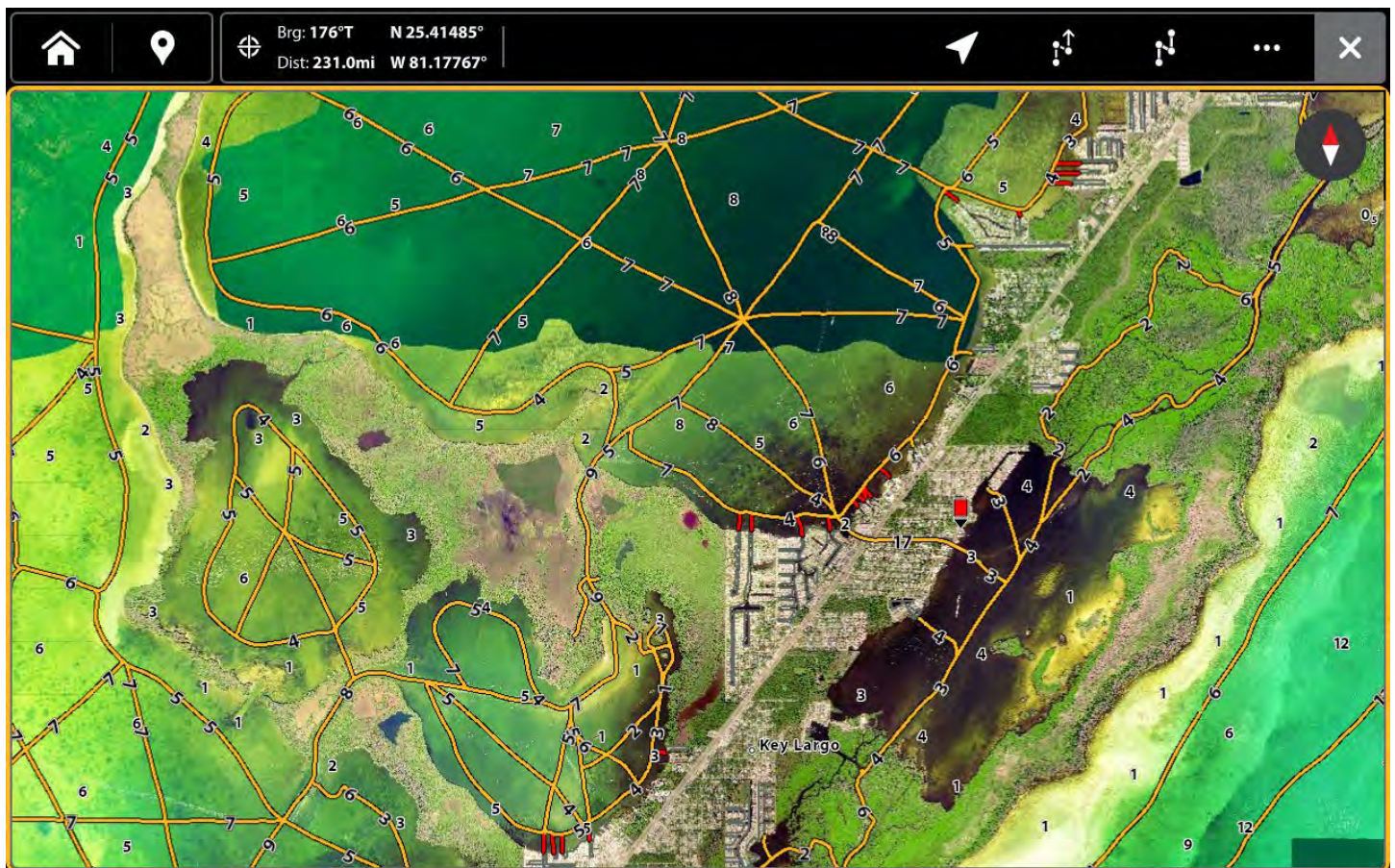
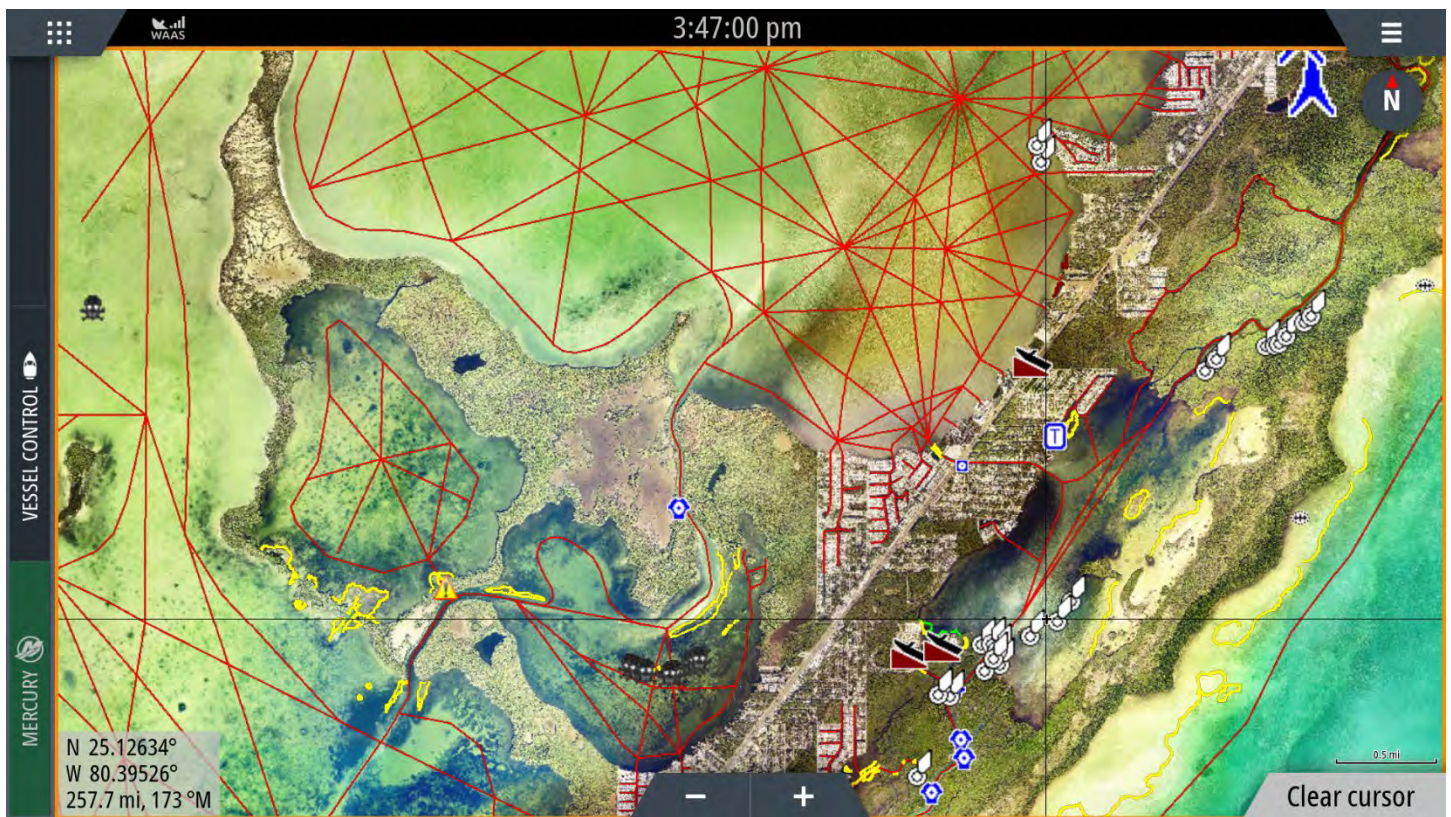


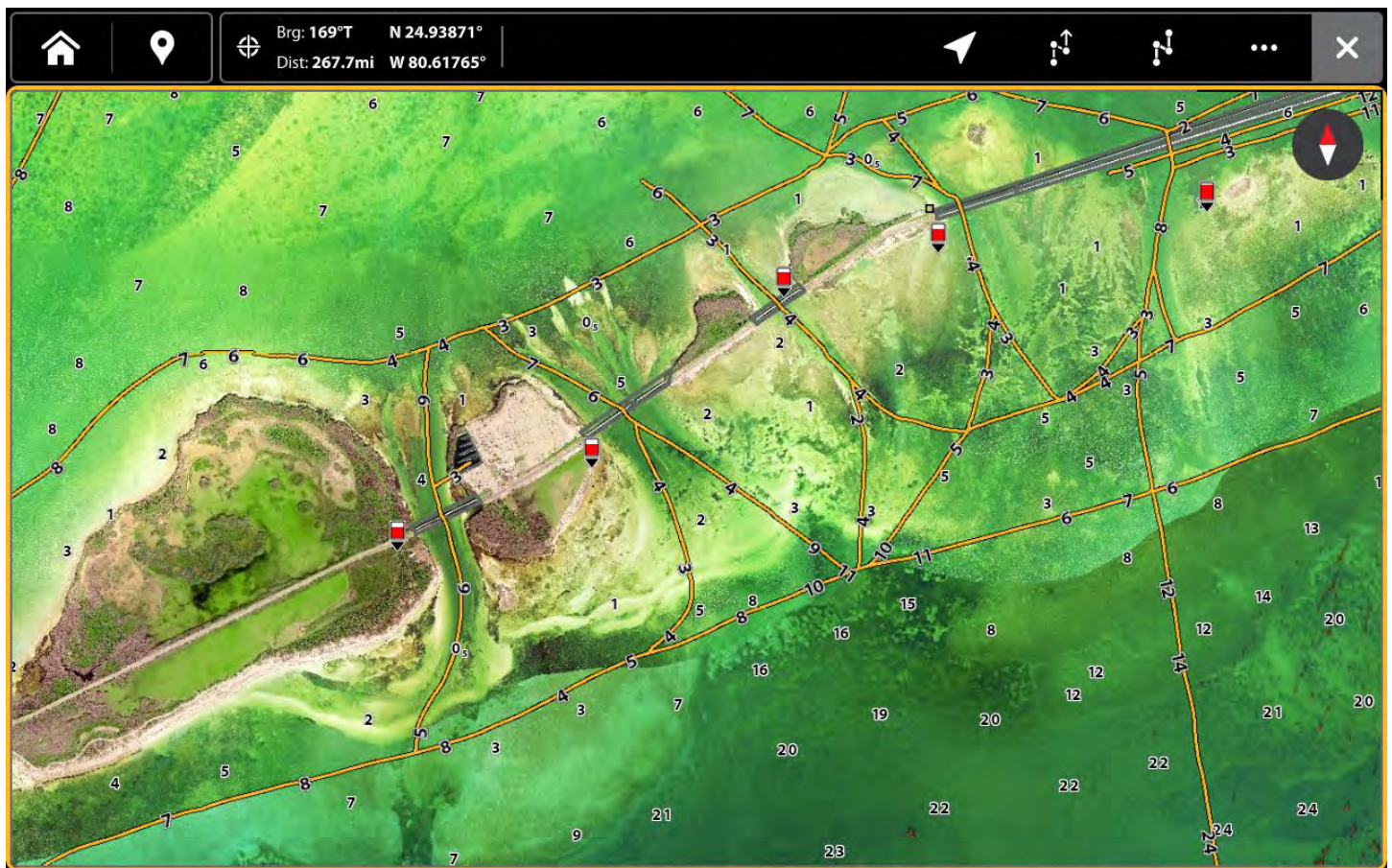


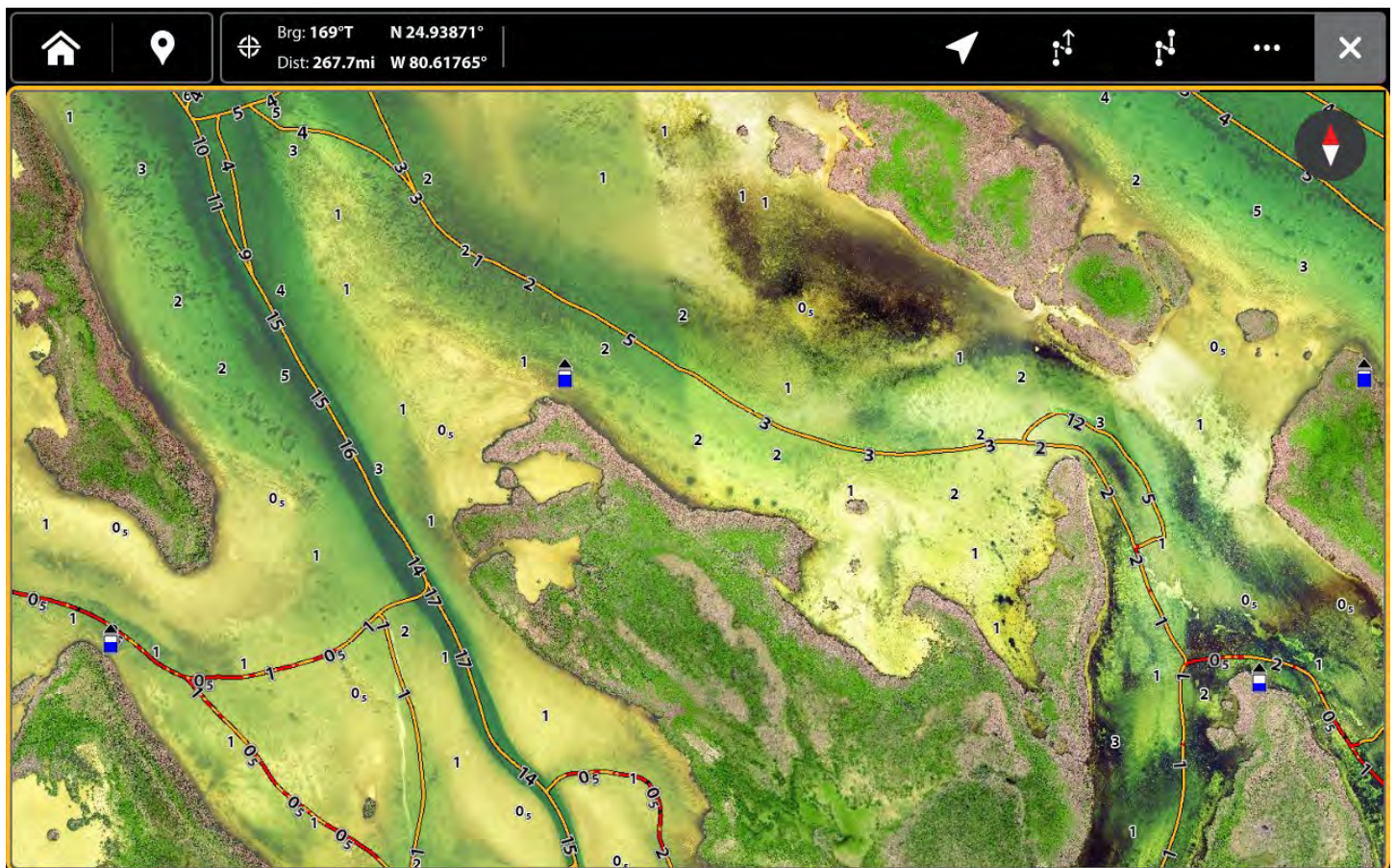
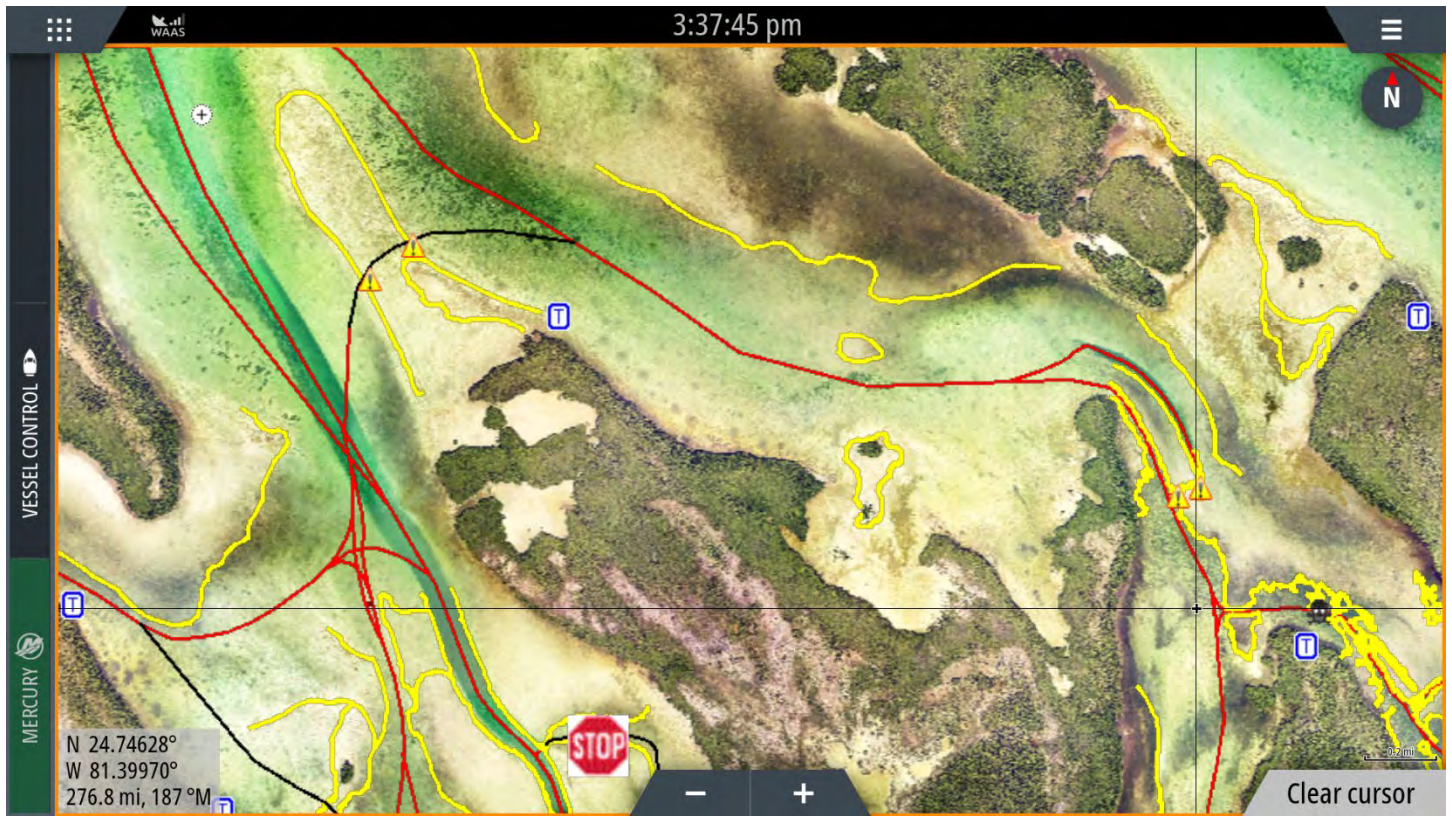


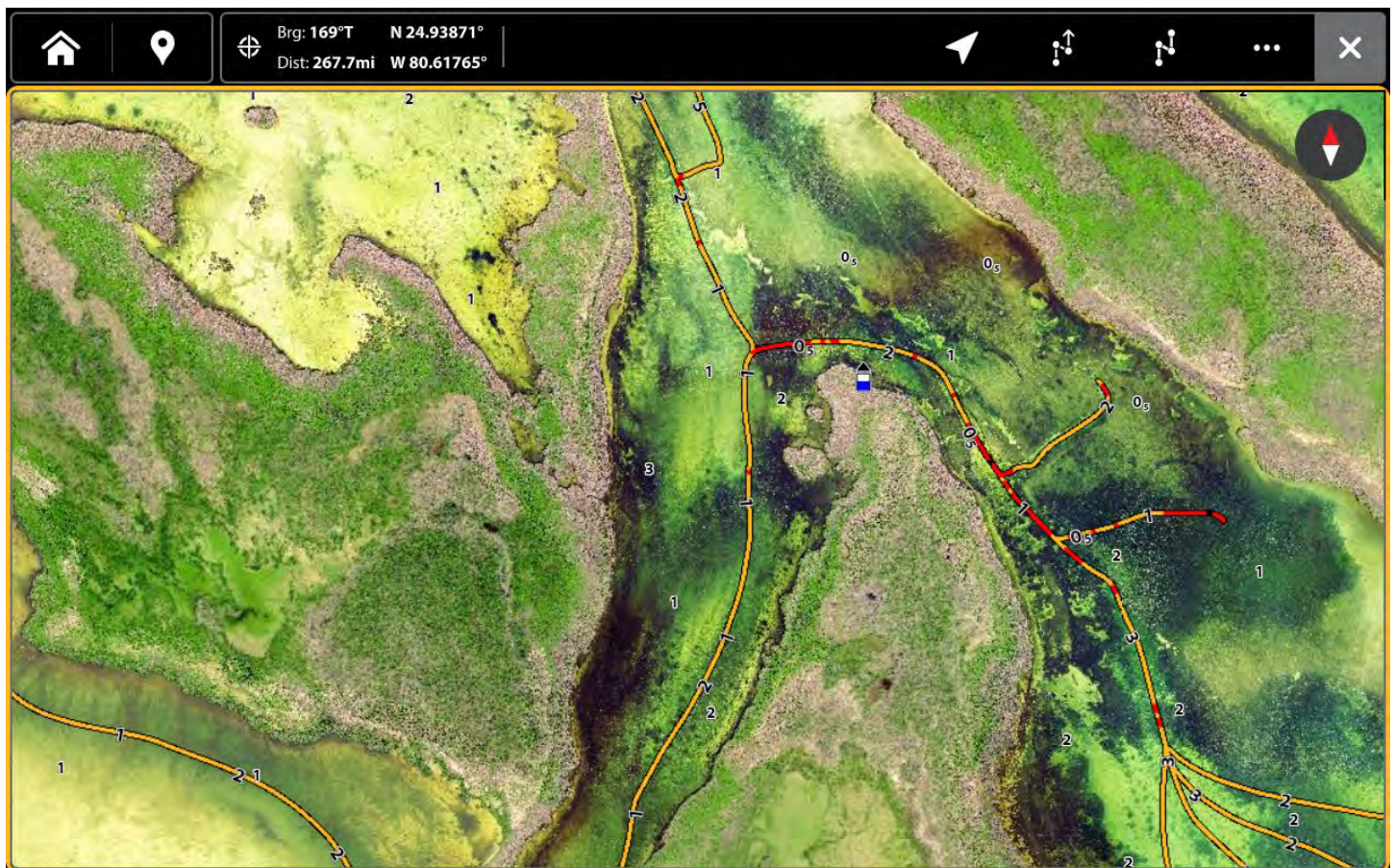


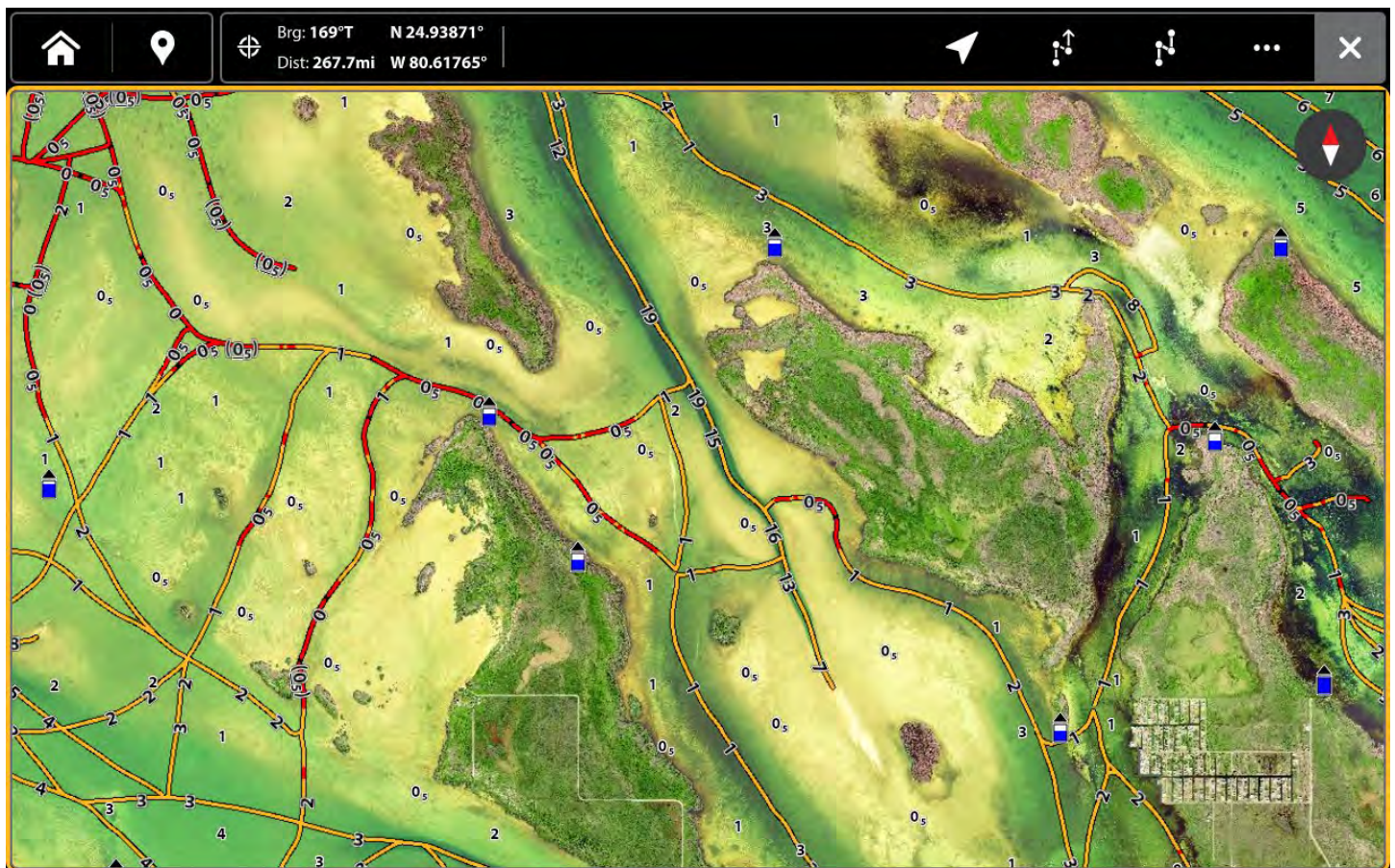
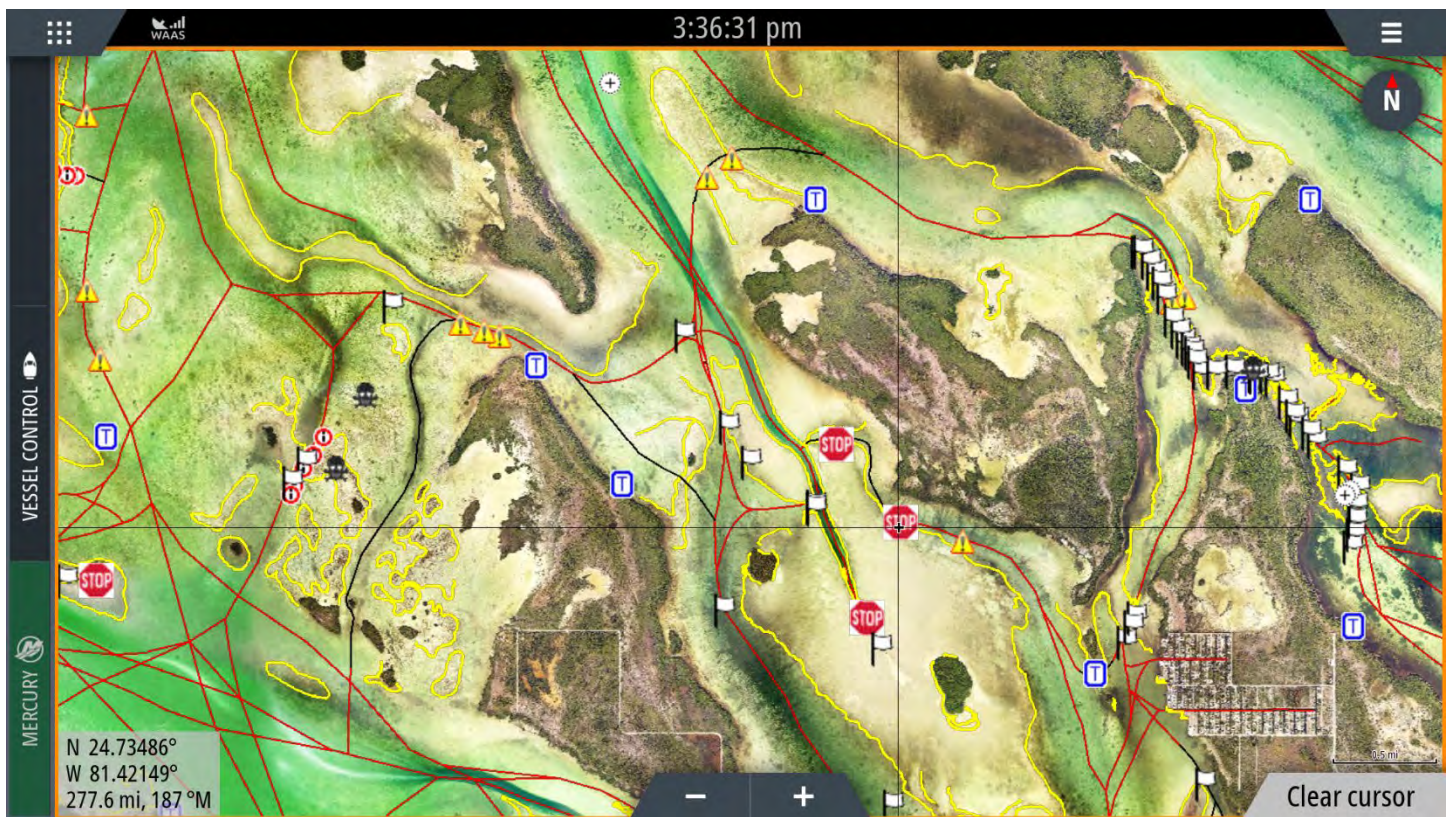


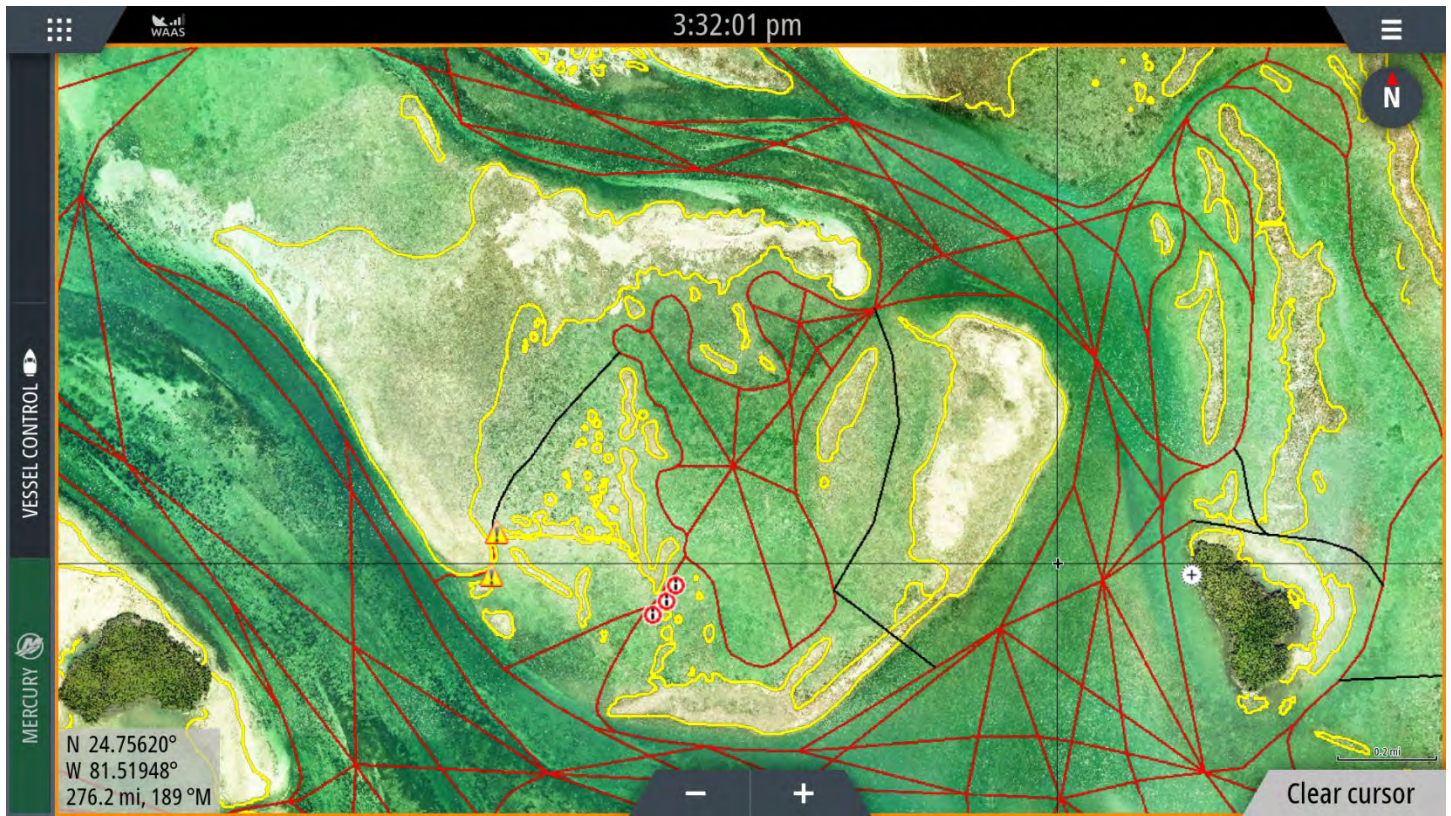


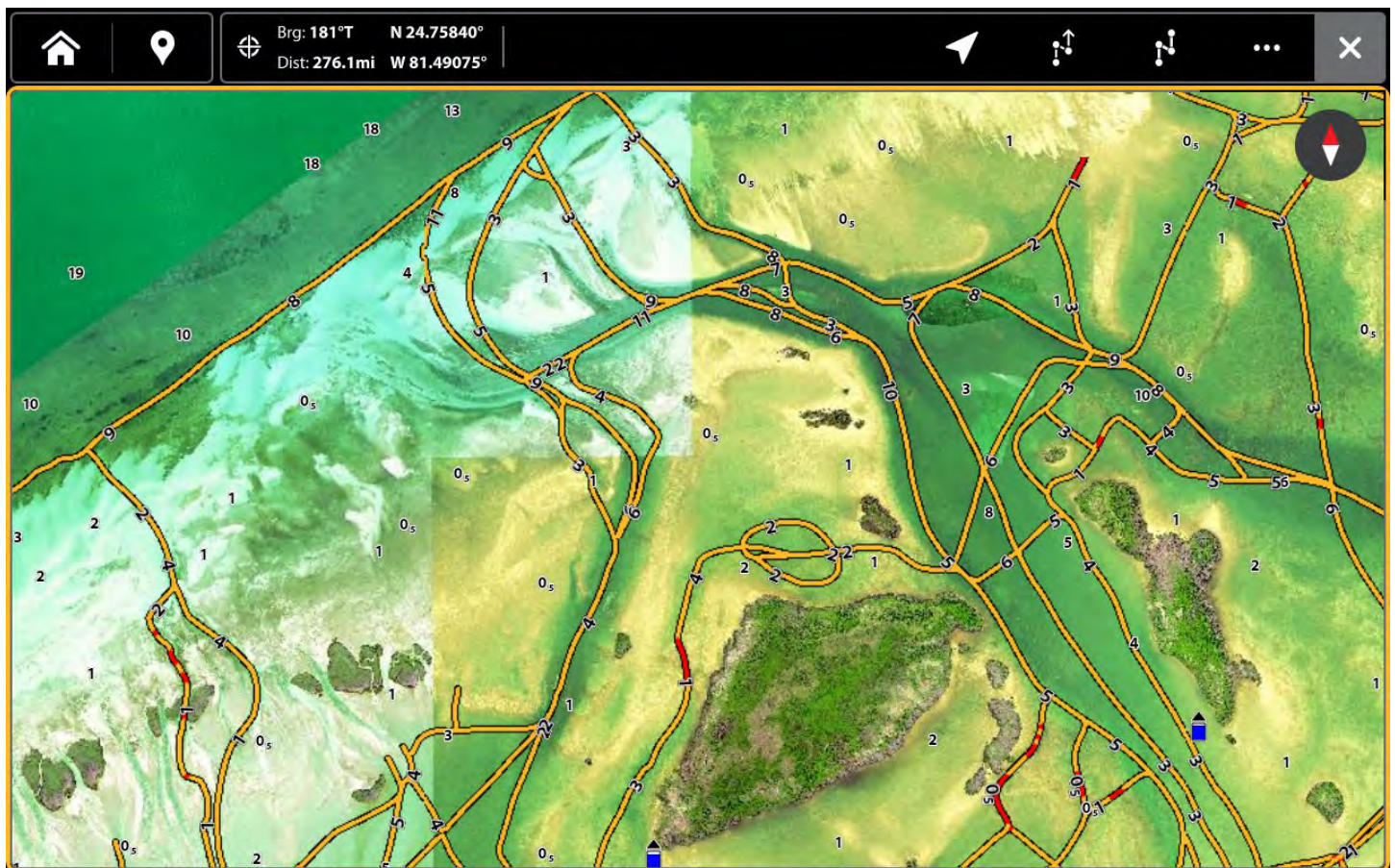
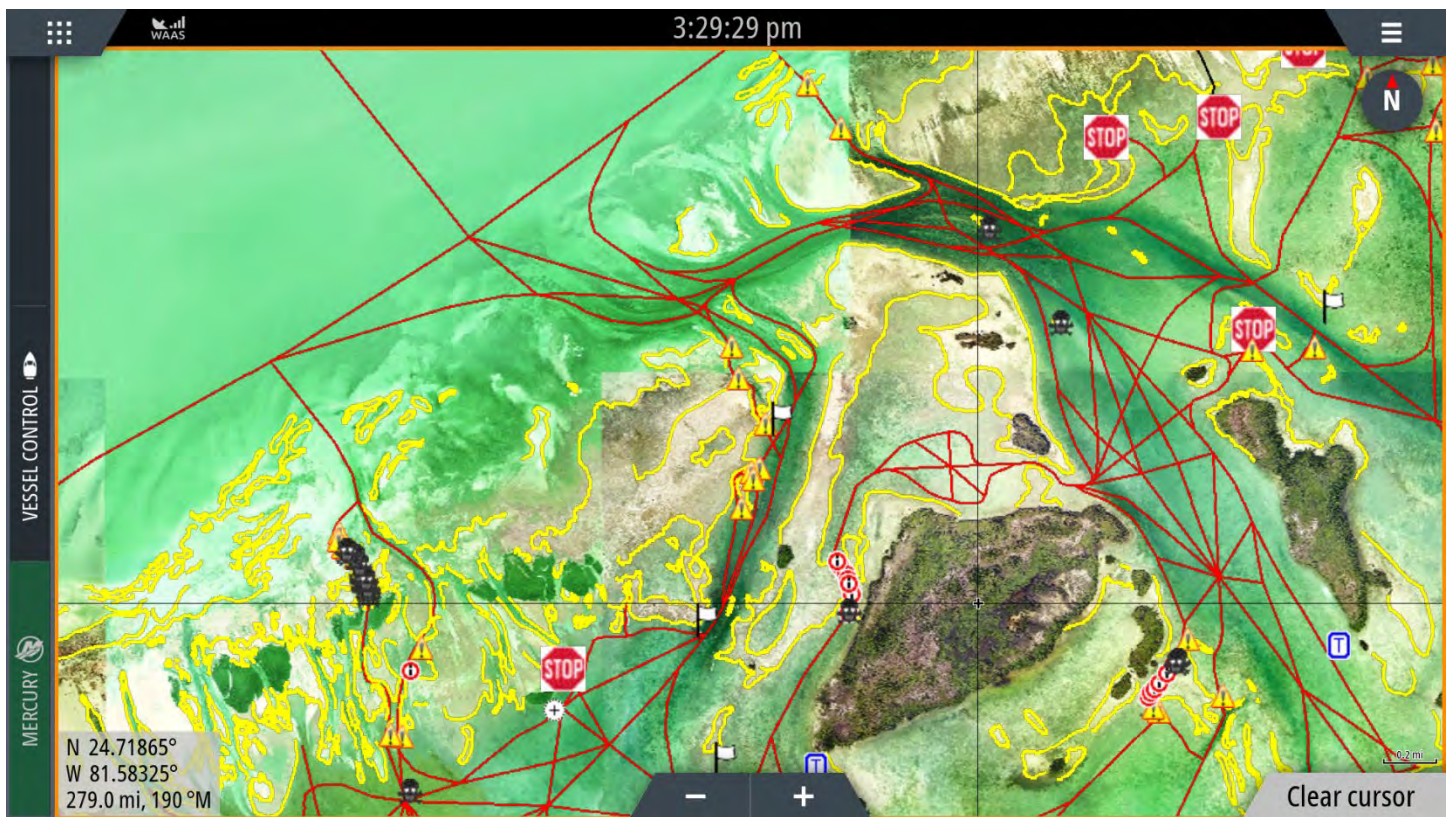


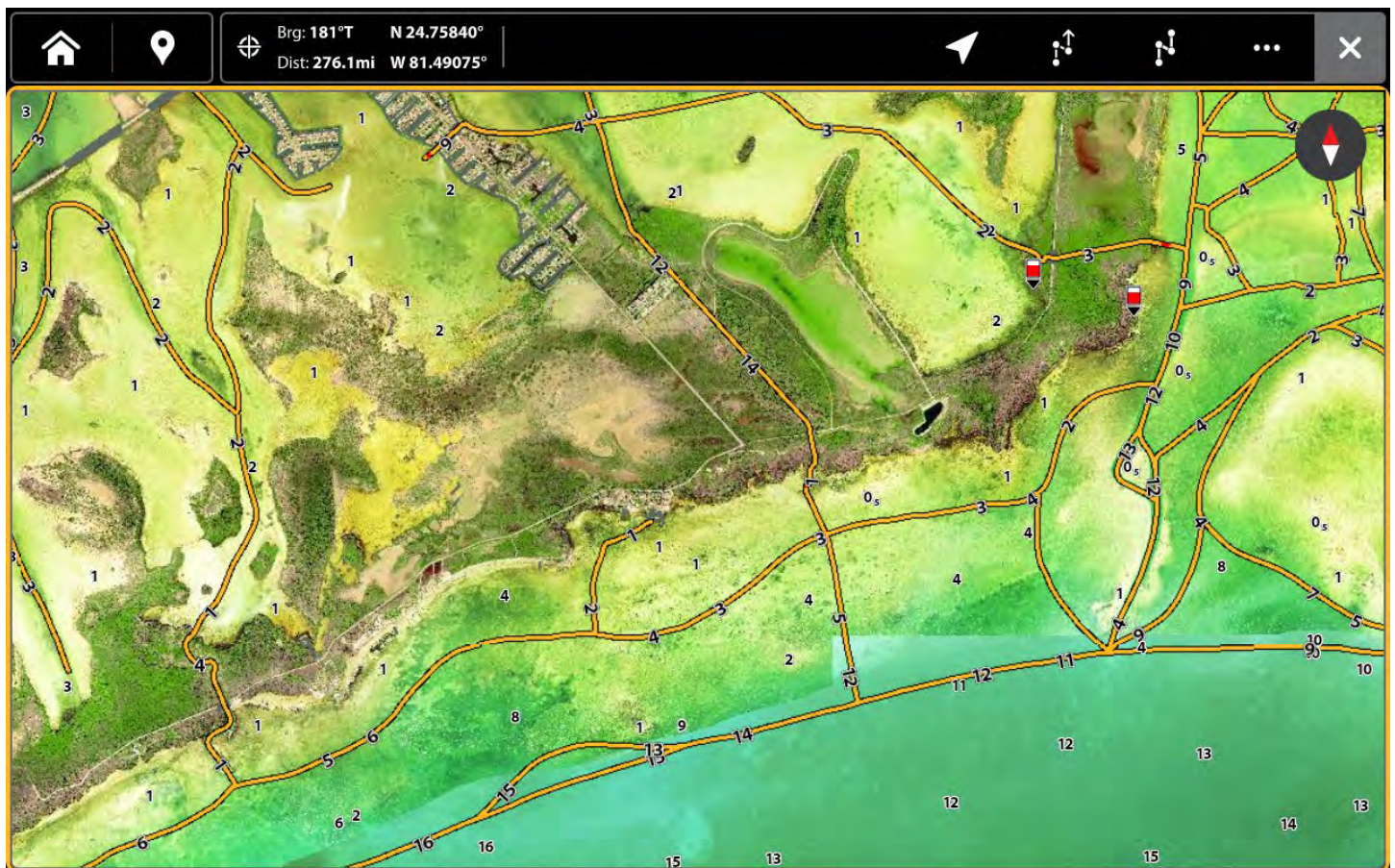


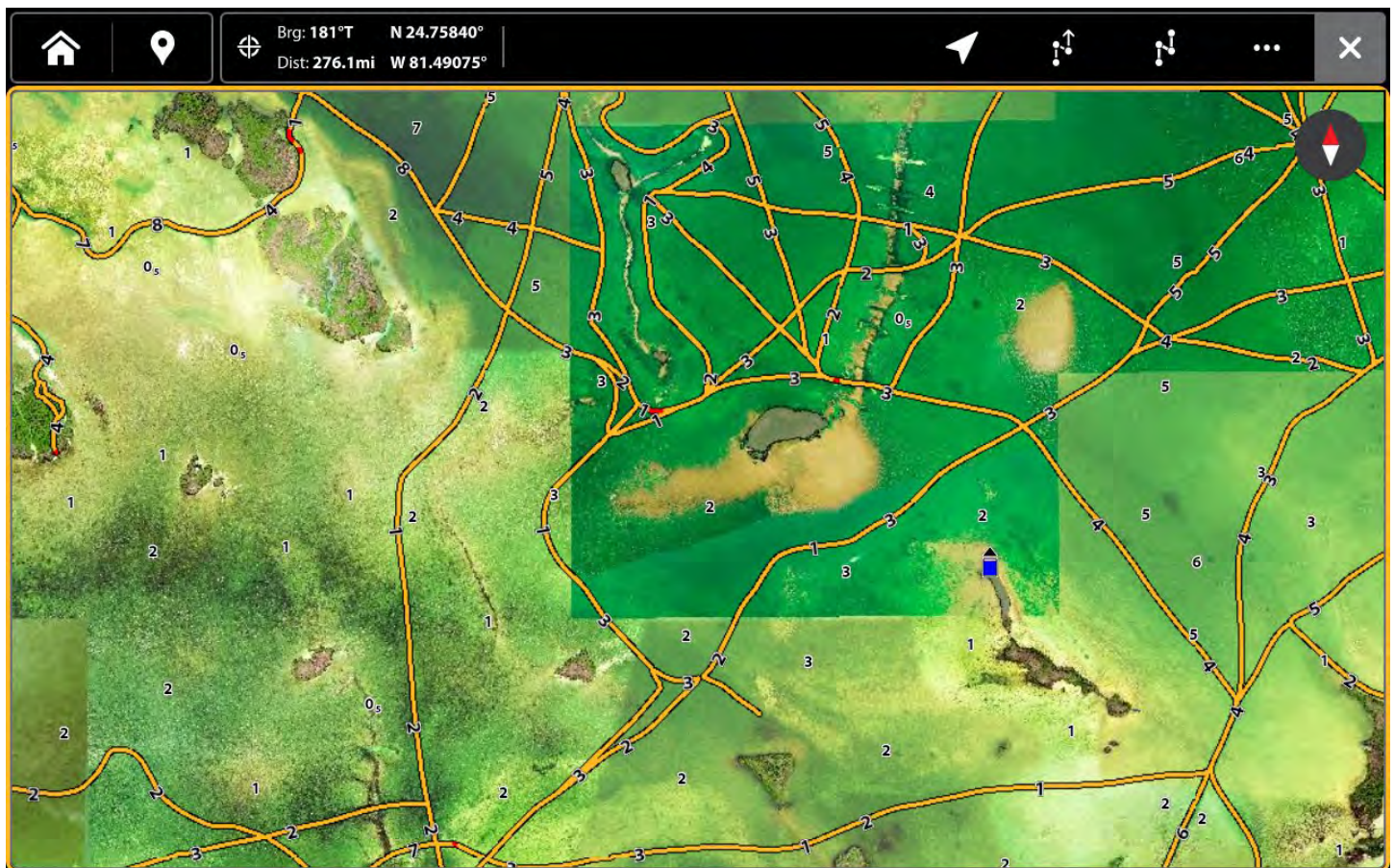


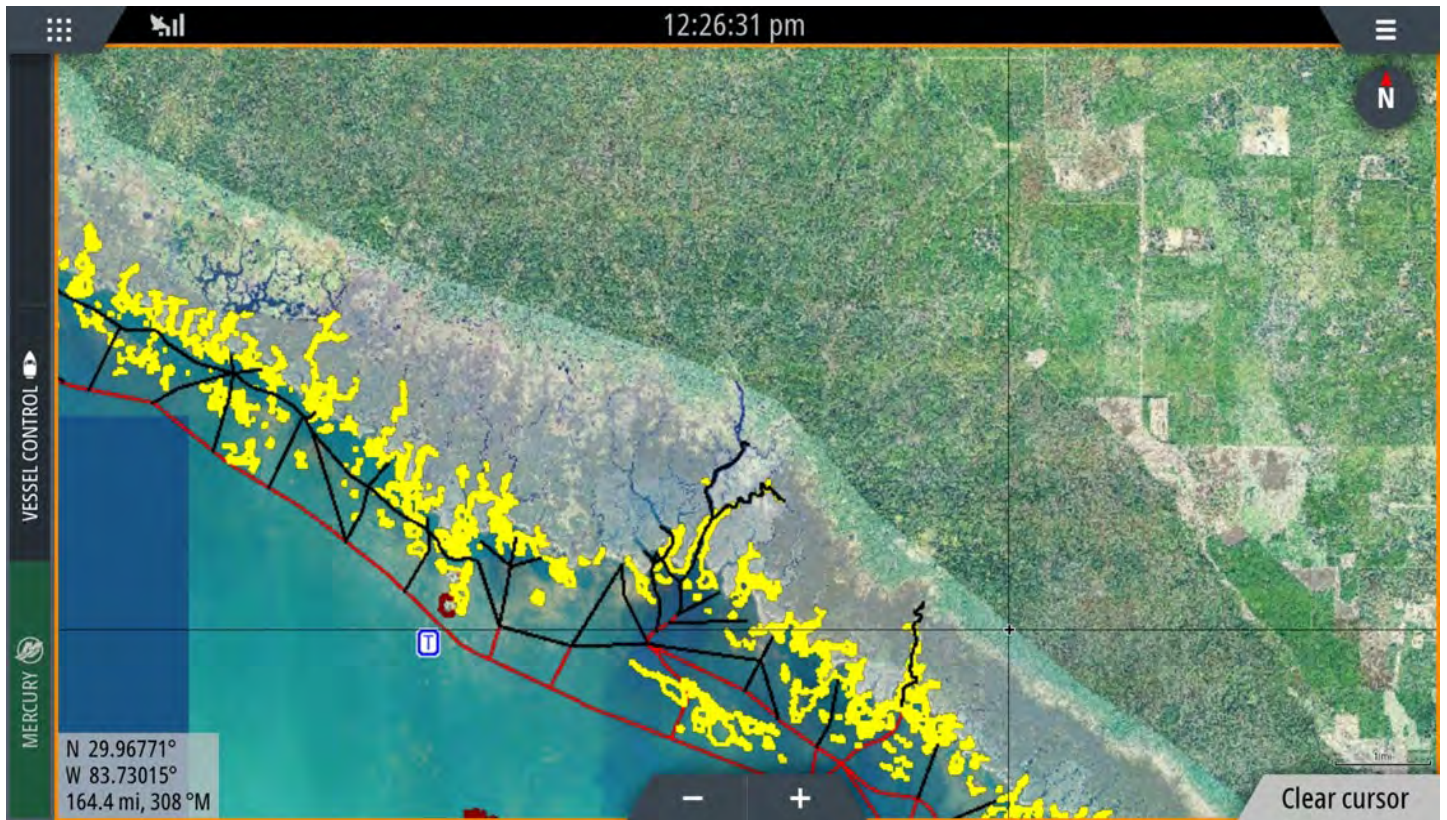


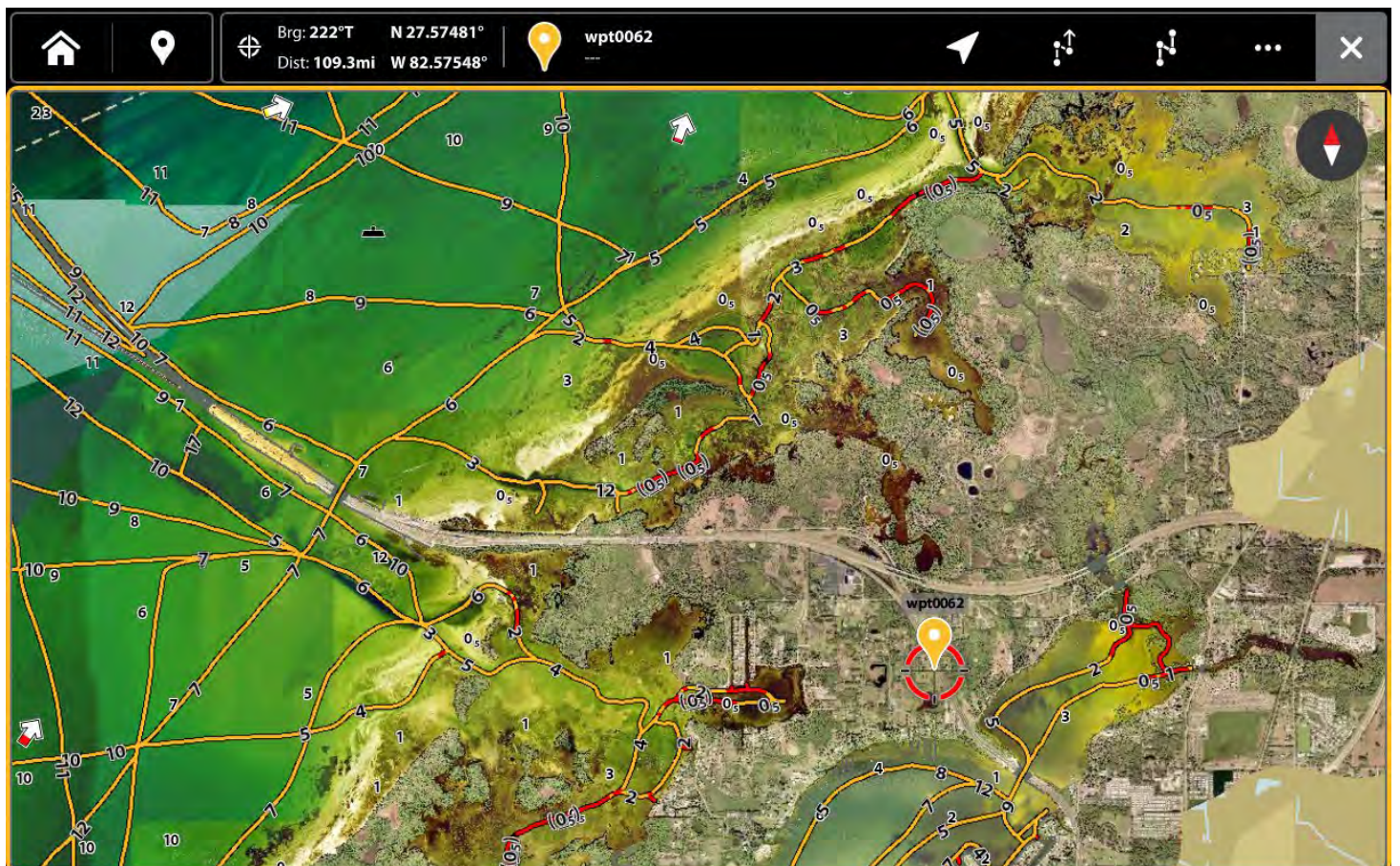


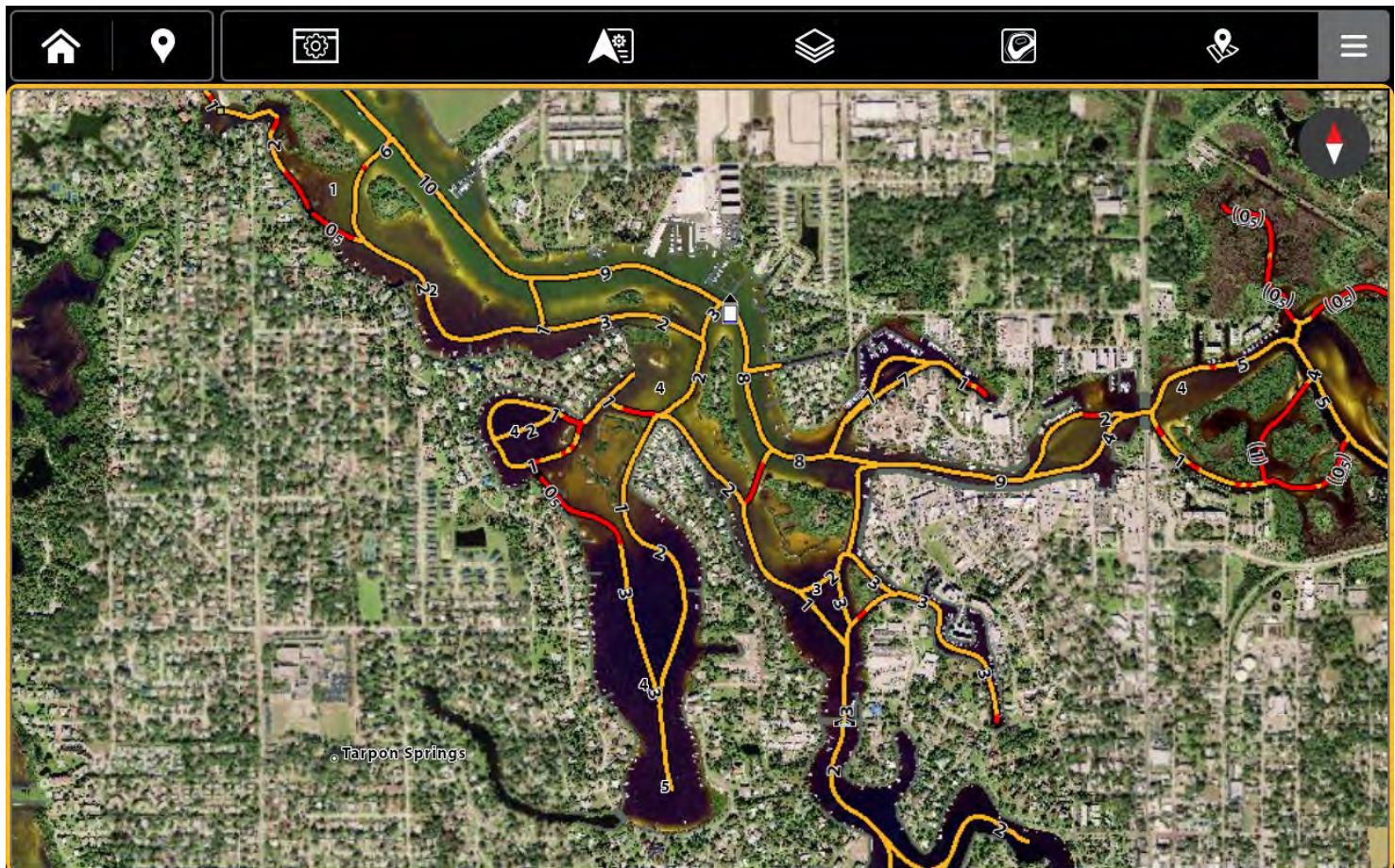


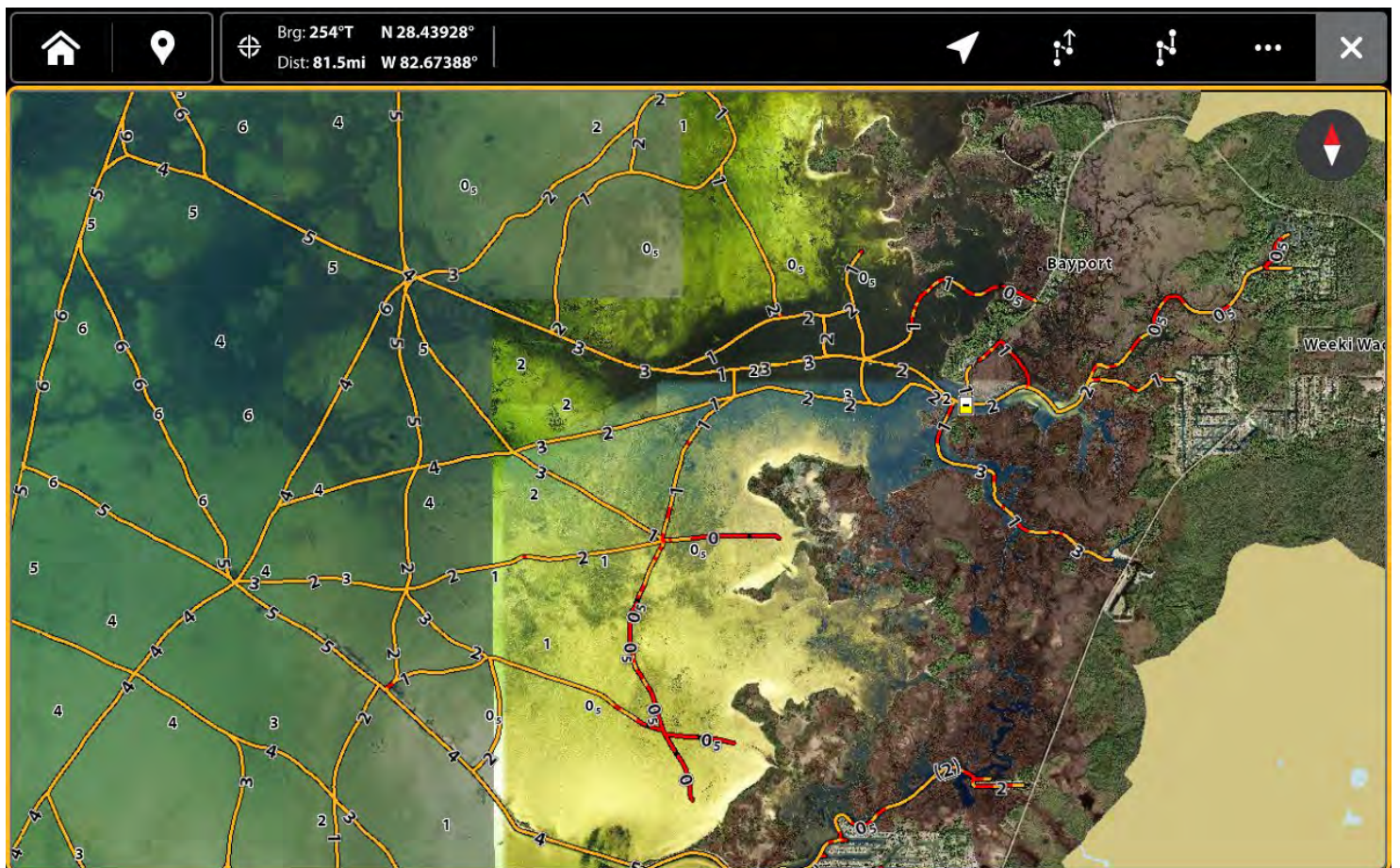
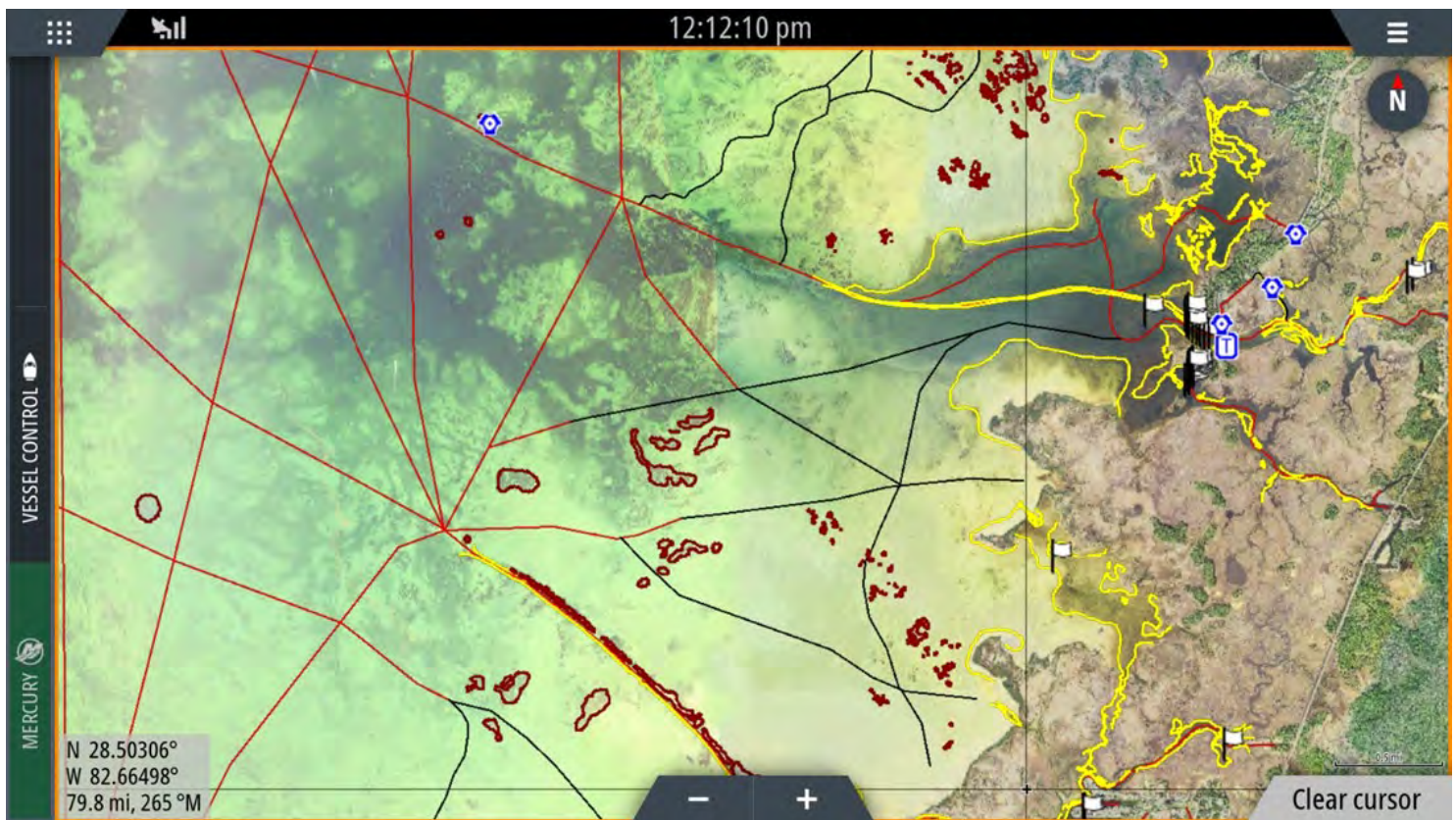


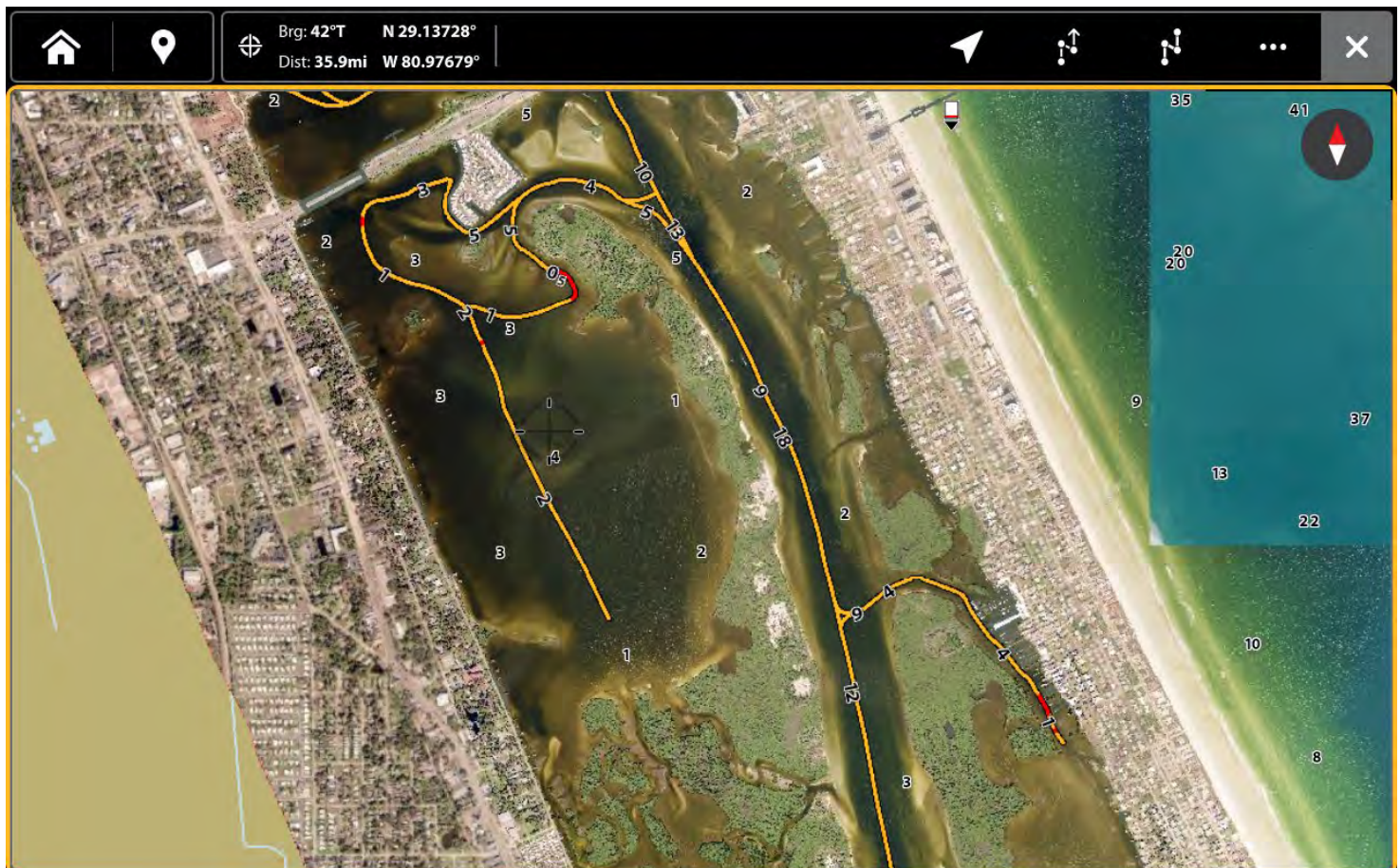
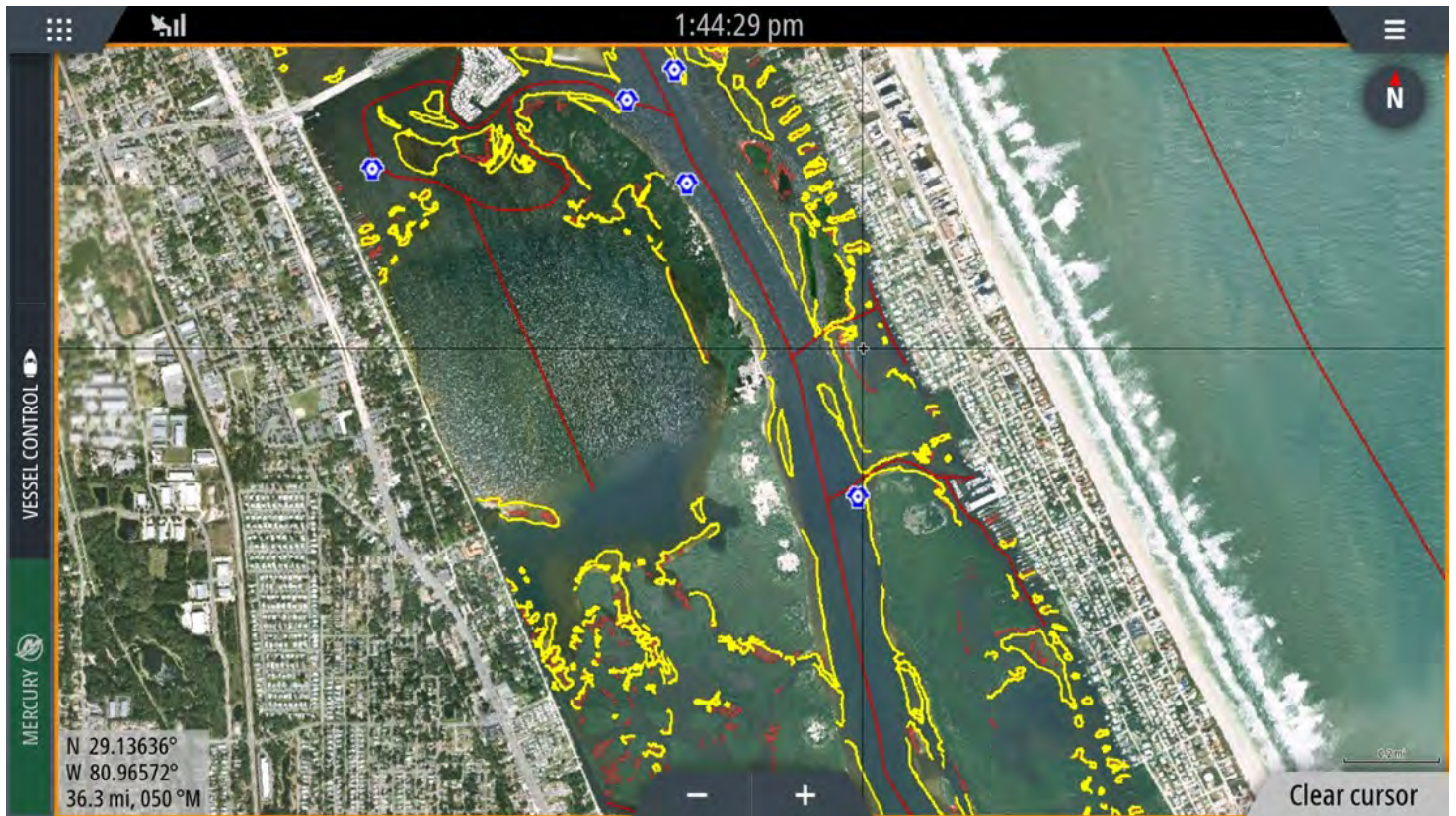


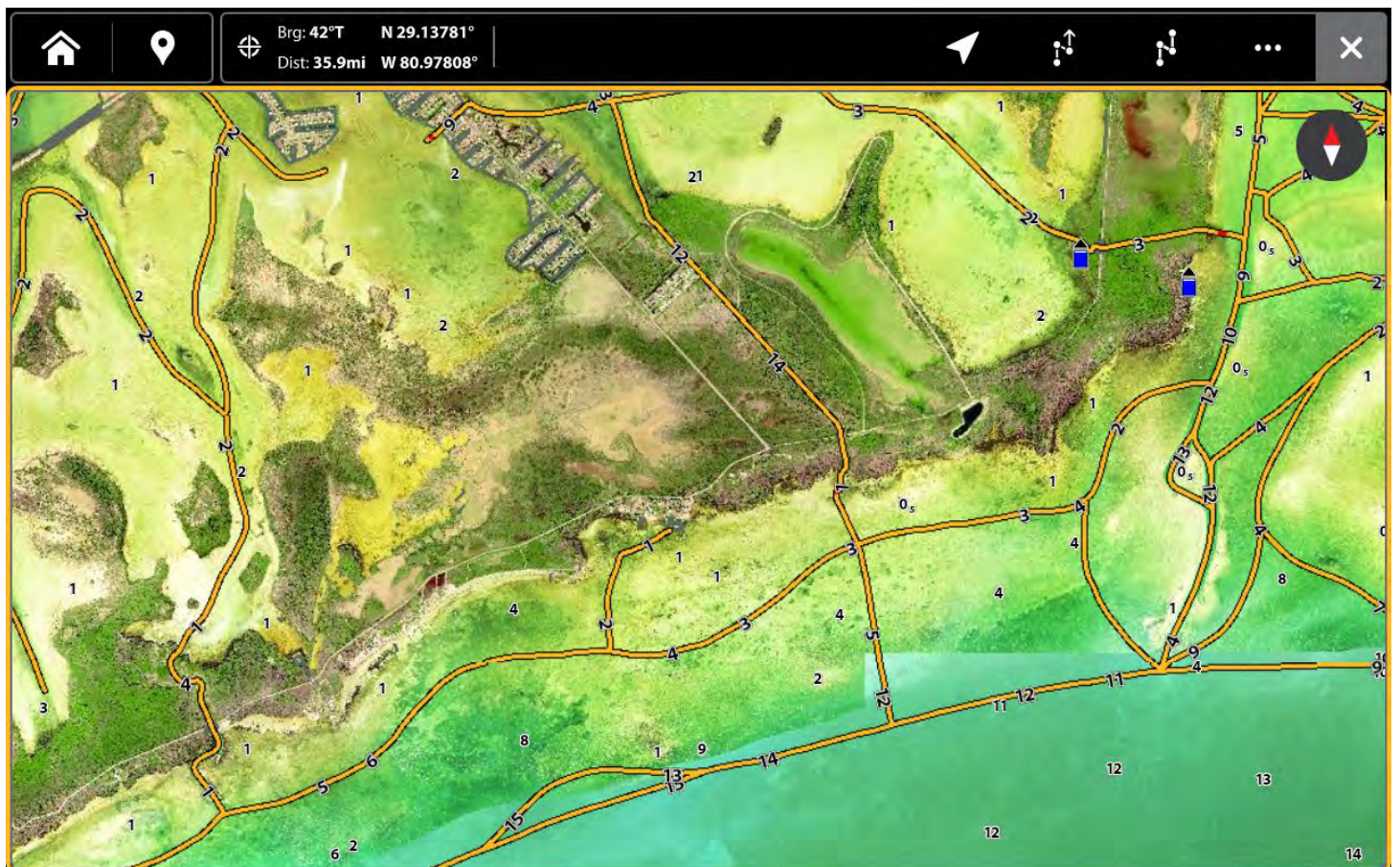


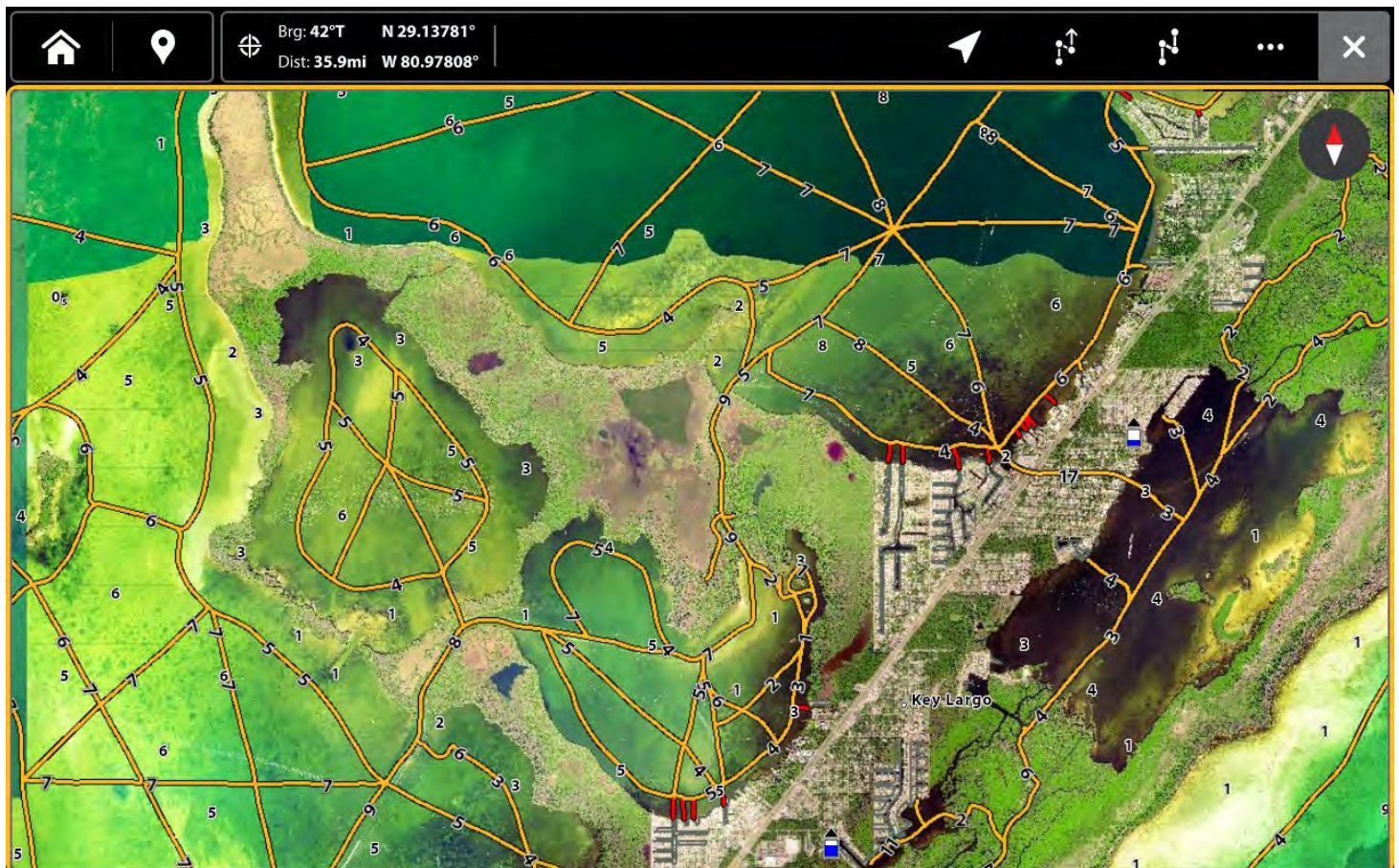


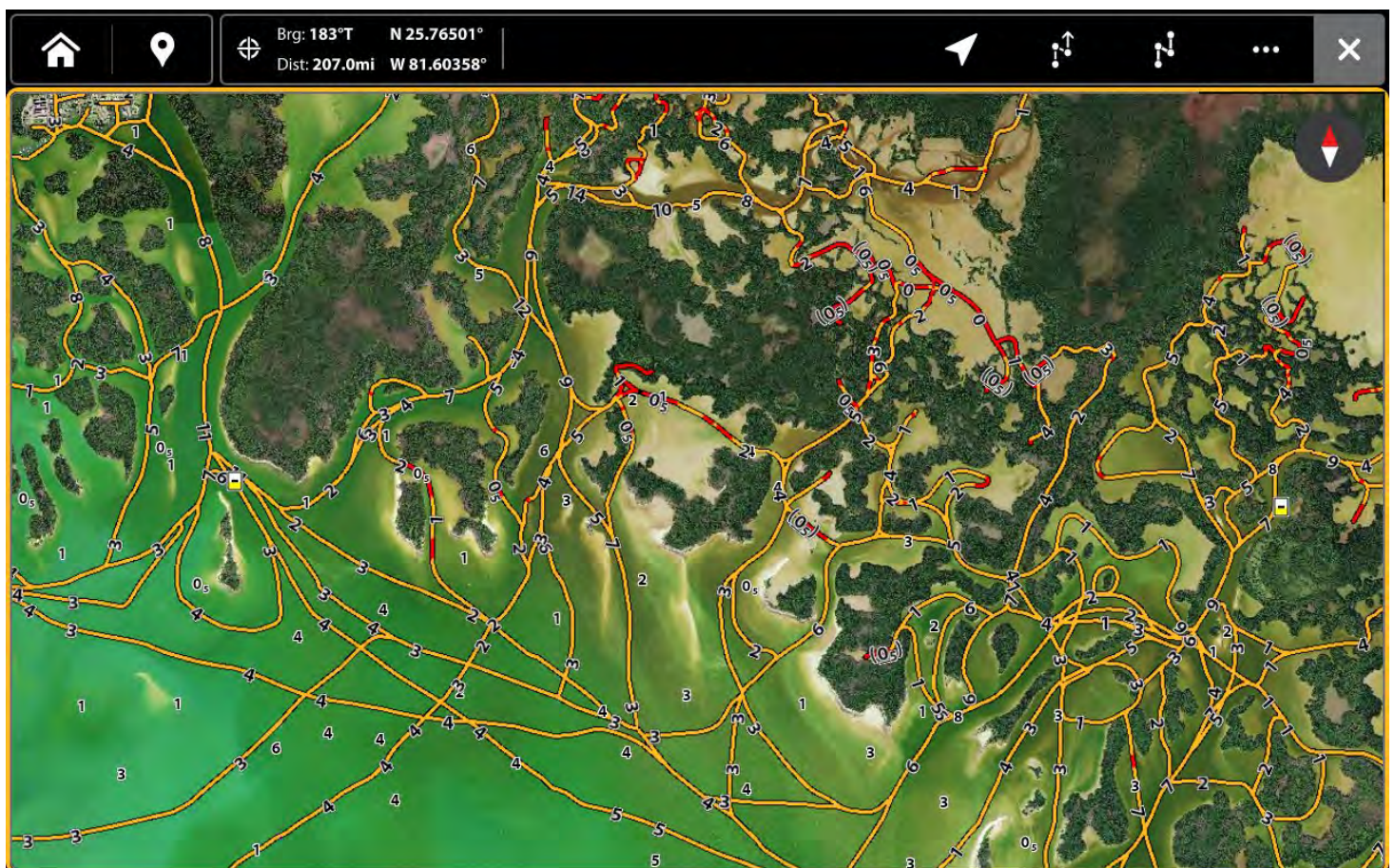
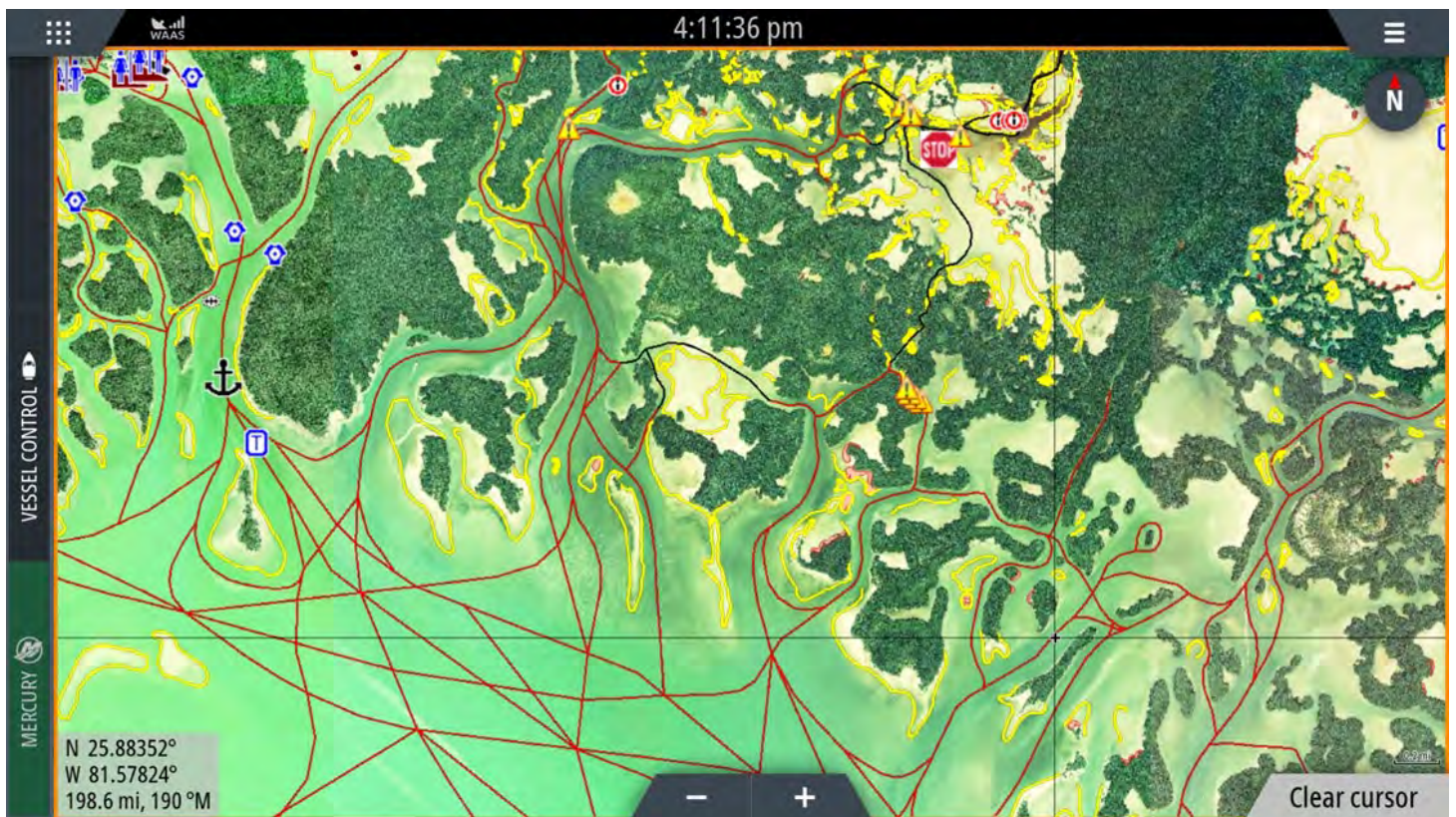












CIVIL COVER SHEET

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

ISLA Mapping, LLC

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

(c) Attorneys (Firm Name, Address, and Telephone Number)

Ryan T. Santurri, Allen, Dyer, Doppelt + Gilchrist, P.A.,
255 S. Orange Ave., Suite 1401, Orlando, FL 32801
407-841-2330

DEFENDANTS

Johnson Outdoors Marine Electronics, Inc.

County of Residence of First Listed Defendant _____
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

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 | ☐ 1 | ☐ 1 | Incorporated or Principal Place of Business In This State | ☐ 4 | ☐ 4 |
| Citizen of Another State | ☐ 2 | ☐ 2 | Incorporated and Principal Place of Business In Another State | ☐ 5 | ☐ 5 |
| Citizen or Subject of a Foreign Country | ☐ 3 | ☐ 3 | Foreign Nation | ☐ 6 | ☐ 6 |

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

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice PERSONAL INJURY ☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor/Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☒ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced and Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable/Sat TV ☐ 850 Securities/Commodities/Exchange ☐ 890 Other Statutory Actions ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☐ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education PRISONER PETITIONS Habeas Corpus: ☐ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☐ 540 Mandamus & Other ☐ 550 Civil Rights ☐ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement			

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 - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

Brief description of cause:

17 U.S.C. § 501 - Copyright Infringement; 15 U.S.C. § 1125 et seq. ~ Lanham Act, Unfair Competition;

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 _____

DOCKET NUMBER _____

DATE

4/03/2025

SIGNATURE OF ATTORNEY OF RECORD

/s/ Ryan T. Santurri

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Middle District of Florida

Civil Action No.

To: *(Defendant's name and address)* Johnson Outdoors Marine Electronics, Inc.
c/o CT Corporation System, Registered Agent
1200 South Pine Island Rd.
Plantation, FL 33324

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: