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10 Attorneys for Defendant and Counterclaimant
11 STYLES FOR LESS, INC.

12 **UNITED STATES DISTRICT COURT**
13 **CENTRAL DISTRICT OF CALIFORNIA**

14 BRAGEL INTERNATIONAL, INC., a
15 California corporation,
16
17 Plaintiff,

18 vs.

19 STYLES FOR LESS, INC., a
20 California corporation; and PPI
21 APPAREL GROUP, INC., a New York
22 corporation,
23
24 Defendants.

25 STYLES FOR LESS, INC., a
26 California corporation,
27
28 Counterclaimant,

vs.

BRAGEL INTERNATIONAL, INC., a
California corporation,
Counter-Defendant.

Case No. 8:15-cv-01756-R (FFMx)

**COUNTERCLAIM AGAINST
BRAGEL INTERNATIONAL, INC.**

[DEMAND FOR JURY TRIAL]

1 Defendant and Counterclaimant Styles for Less, Inc. (“Counterclaimant”), by
2 and through its undersigned counsel, complains and alleges against Plaintiff and
3 Counter-Defendant Bragel International, Inc. (“Counter-Defendant”) as follows:

4 1. Counterclaimant is a corporation organized and existing under
5 the laws of the State of California, with its principal place of business at
6 1205 North Miller Street, #120, Anaheim, California.

7 2. Counterclaimant is informed and believes, and on that basis
8 alleges, that Counter-Defendant is a corporation organized and existing under
9 the laws of the State of California, with its principal place of business at
10 3833 Pomona Boulevard, Pomona, California.

11 3. The Court has personal jurisdiction over Counter-Defendant by virtue
12 of its filing of an Amended Complaint (“Complaint”) in this matter.

13 4. This Counterclaim arises under Title 35 of the United States Code, this
14 Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).
15 Federal jurisdiction of the claims asserted herein is proper on the basis of
16 supplemental jurisdiction pursuant to 28 U.S.C. § 1367(a) and pursuant to
17 28 U.S.C. §2201, *et seq.*

18 5. To the extent that this action remains in this District, venue is
19 appropriate for this Counterclaim because Counter-Defendant has consented to the
20 propriety of venue in this Court by filing its claims for patent infringement in this
21 Court.

22 **COUNT ONE**

23 **DECLARATORY JUDGMENT OF NON-INFRINGEMENT**

24 6. Counterclaimant incorporates and realleges paragraphs 1-5 of this
25 Counterclaim as if set forth in full herein.

26 7. Counter-Defendant has filed an action for patent infringement against
27 Counterclaimant.

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7. Counterclaimant hereby demands a trial by jury on all issues so triable.

BUCHALTER NEMER
A Professional Corporation

By: _____ /s/
MATTHEW L. SEROR
Attorneys for Defendant
and Counterclaimant
STYLES FOR LESS, INC.