

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

<p>National Presto Industries, Inc.,</p> <p>Plaintiff,</p> <p>v.</p> <p>U.S. Merchants Financial Group, Inc., d/b/a Greenmade,</p> <p>Defendant.</p>	<p>Case No. 18-cv-03321 (SRN/BRT)</p> <p>JOINT PROPOSED INTRODUCTION TO THE CASE</p>
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Pursuant to the Court’s Final Pretrial Order (Dkt. 354), the parties submit the following joint introduction to the case, to be read to prospective jurors during voir dire:

This case involves two parties: Plaintiff National Presto Industries, Inc., and Defendant U.S. Merchants Financial Group, Inc., d/b/a Greenmade. The parties each sell parabolic electric heaters at Costco. Plaintiff alleges that it holds valid copyrights in two separate instruction manuals for Plaintiff’s parabolic electric heaters—works that are titled *HEATDISH Plus Tilt Parabolic Electric Heater Instructions* and *HEATDISH Parabolic Electric Heater Instructions*. Plaintiff further alleges that Defendant’s instruction manual, which was included within the package for Defendant’s parabolic electric heater sold at Costco from Fall 2018 through Spring 2019, infringes Plaintiff’s copyrights. Defendant denies Plaintiff’s claims.

This introduction is also incorporated in the parties’ Joint Proposed Jury Instructions (Dkt. 389) in the “Before Voir Dire” proposed instruction.

Dated: December 15, 2021

Respectfully submitted,

s/ Franklin M. Smith (with permission)

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