

reasonable royalty; treble damages under 35 U.S.C. §§ 284 and 285; and the reasonable attorney's fees and costs incurred in prosecuting this action, including prejudgment interest.

PARTIES

2. Plaintiff Microwave Vision, S.A. ("Microwave Vision") is a société anonyme or corporation under the laws of France with its principal place of business at 17 avenue de Norvège, 91140 Villebon-sur-Yvette, France. Microwave Vision is a group of high-tech companies combining technological expertise and product portfolios in the technologies of measurement solutions using multi-probe technology; antenna, RCS (radio cross-section), and Radome measurements using advanced positioning systems; and absorbing materials and shielding for anechoic and EMC (electromagnetic compatibility) chambers.

3. Plaintiff Satimo Industries, SAS ("Satimo") is a société par actions simplifiée or corporation under the laws of France with a location at 17 avenue de Norvège, 91140 Villebon-sur-Yvette, France. Satimo is an established leader in the development, production and sale of antenna measurement technology and systems, and operates as a wholly-owned subsidiary of Microwave Vision.

4. Plaintiff Satimo USA, Inc. ("Satimo USA") is a corporation of the State of Delaware with its principal place of business at 2105 Barrett Park Drive,

Suite 104, Kennesaw, Georgia 30144 (Cobb County). Satimo USA is involved in the assembly, marketing, and sales of multi-probe measurement systems, and operates as a wholly-owned subsidiary of Microwave Vision.

5. Upon information and belief, Defendant ESCO Technologies, Inc. ("ESCO") is a corporation of the State of Missouri, having a place of business at 9900A Clayton Road, St. Louis, Missouri 63124. ESCO produces engineered products and systems for utility, industrial, aerospace, and commercial applications. Upon information and belief, ESCO can be served with process through service upon its management at the same address.

6. Upon information and belief, Defendant ETS-Lindgren, Inc. ("ETS-Lindgren") is an operating company and wholly-owned subsidiary of Defendant ESCO, which was formed on October 1, 2012, by the merging of ETS-Lindgren, L.P. and Lindgren R.F. Enclosures, Inc. Upon information and belief, ETS-Lindgren is a corporation of the State of Illinois, having a place of business at 1301 Aeropoint Drive, Cedar Park, Texas 78613. Upon information and belief, ETS-Lindgren can be served with process through service upon its management at the same address.

JURISDICTION AND VENUE

7. This is a civil action arising under the Patent Laws of the United States, 35 U.S.C. §§ 1 *et seq.* This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a).

8. Upon information and belief, Defendants ESCO and ETS-Lindgren are doing business in this judicial district and/or are committing acts of patent infringement as alleged in this Complaint in this judicial district, and the Court has personal jurisdiction for these reasons.

9. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b).

BACKGROUND REGARDING PLAINTIFFS' TECHNOLOGY

10. Since at least 1989, Plaintiff Microwave Vision (originally under the name Société d'Applications Technologiques de l'Imagerie Micro Ondes) has been an innovator and pioneer in high-speed microwave field measurement systems.

11. In 1996, Plaintiff Microwave Vision began to focus its business on antenna measurement systems for the telecom market, and went on to establish itself as a leader in antenna measurement technology.

12. From 1998 through 2005, Microwave Vision had numerous technological breakthroughs that led to the introduction of a multi-probe and very

fast antenna measurement solution dedicated to the telecom, automobile, defense and aerospace, and industrial inspection of materials industries.

13. In 2000, Microwave Vision established a U.S. branch office in Kennesaw, Georgia, which today is the principal place of business of Satimo USA. The name Satimo USA, Inc. is presently being changed to MVG, Inc.

14. In 2008, Microwave Vision acquired a majority ownership of ORBIT/FR, which expanded Microwave Vision's business to include the production of positioners for antenna measurements, and electromagnetic absorbers for use in anechoic chambers both for antenna measurements and EMC applications. By virtue of this acquisition, Microwave Vision expanded its U.S. offices to include the present Satimo USA office in San Diego, California.

15. In 2008, Satimo Industries, SAS was created as an entirely owned subsidiary of Société D'Applications Technologies de L'Imagerie Micro Ondes (later changed in name to Microwave Vision, S.A.).

PLAINTIFF'S PATENTED TECHNOLOGY

16. On October 28, 2008, the United States Patent and Trademark Office duly and legally issued the '170 Patent, entitled Device and Method for Determining at Least One Variable Associated with the Electromagnetic Radiation of an Object Being Tested. Phillippe Garreau, Luc Duchesne, Per Olav Iversen,

and Arnaud Gandois are the inventors of the '170 Patent. A true and correct copy of the '170 Patent is attached hereto as Exhibit A.

17. Plaintiff Microwave Vision is the owner of the entire right, title, and interest in and to the '170 Patent.

18. The '170 Patent is directed to a multi-probe array system equipped with a "goniometer" for antenna measurements in a variety of applications and technologies. The patented use of a goniometer allows the system to take a greater number of measurement points than the number of probes in the system, and thereby to significantly increase the accuracy of the measurements.

19. Plaintiff Microwave Vision has employed the invention of the '170 Patent in its own multi-probe array systems equipped with a goniometer for antenna measurements and has promoted the advantages and capabilities of this invention in marketing its systems in competition with the multi-probe array systems for antenna measurements later introduced by its competitors.

20. Multi-probe array systems equipped with goniometers for antenna measurements have been marketed and sold in the United States by Plaintiffs. These systems have been manufactured and assembled in France by Microwave Vision's wholly owned subsidiary Satimo Industries, SAS, and have been shipped to Satimo USA, Inc., also a wholly owned subsidiary of Microwave Vision, to

complete sales in the United States with Satimo USA also providing installation and servicing of such equipment.

FIRST CLAIM FOR RELIEF
Infringement Of The '170 Patent

21. Plaintiffs reassert and reallege the preceding paragraphs 1-20, as though fully set forth herein.

22. Upon information and belief, Defendants ESCO and ETS-Lindgren make, offer for sale, sell, and distribute high-speed multi-antenna array test systems for the measurement of antenna performance of wireless devices and devices with embedded wireless functions.

23. Upon information and belief, Defendants ESCO and ETS-Lindgren have been and now are directly and jointly infringing, literally and under the doctrine of equivalents, at least claim 12 of the '170 Patent by making, using, offering for sale, and/or selling in the United States their AMS systems, including their AMS-8900 Series of antenna measurement systems, which include a goniometer as a means for pivoting the support about a point located in the plane formed by the network of probes to vary, between successive measurements, the angle formed between one of the network of probes and the main axis of the support so the total measurement points are greater than the number of probes.

24. Upon information and belief, defendants ESCO and ETS-Lindgren have advertised and promoted the benefits and advantages of their AMS-8900 Series of antenna measurement systems that include a goniometer in order to gain sales of this system to prospective customers desiring the capability of a multi-probe antenna measurement system having a goniometer to improve the accuracy of measurement.

25. Plaintiffs and Defendants are direct competitors in the sales of multi-probe antenna measurement systems having goniometers, and Defendants' infringement of the '170 Patent by the sales of such systems has allowed Defendants to take sales that but for Defendants' infringement would have gone to Plaintiffs' multi-probe antenna measurement systems having goniometers covered by the '170 Patent. Thus, the infringement of the '170 Patent by ESCO and ETS-Lindgren has cost Plaintiffs damages in the form of both lost profits on lost sales and a reasonable royalty for use of Plaintiff's patented invention, and continues to cost Plaintiffs such damages.

26. On February 6, 2014, Plaintiffs' counsel provided written notice to ESCO and ETS-Lindgren of the '170 Patent, pointed out Defendants' infringement of claims of the '170 Patent, and demanded that Defendants stop such infringement.

27. After a response from Defendants' attorneys, Plaintiffs' attorney sent a further letter of February 19, 2014, enclosing a claim chart documenting infringement by ESCO and ETS-Lindgren of at least claim 12 of the '170 Patent and demanding that Defendants cease such infringement.

28. Despite having notice of their infringement of the '170 Patent since February 6, 2014, Defendants ESCO and ETS-Lindgren have refused to cease such infringement.

29. Defendants' infringement has irreparably injured Plaintiffs and will continue to injure Plaintiffs, unless and until the Court enters an injunction prohibiting further infringement, and specifically enjoins further manufacture, use, offer for sale, and sale of ETS-Lindgren's Model AMS 8900 Series antenna measurement systems including goniometers and any other such products which infringe the '170 Patent.

30. Upon information and belief, Defendants' infringement of the '170 Patent has been intentional and willful and in total disregard of Plaintiffs' patent rights to the extent that Plaintiffs should be entitled to increased damages, as well as a recovery of their legal fees and costs in the action.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs Microwave Vision, S.A., Satimo Industries, SAS, and Satimo USA, Inc. respectfully request the Court to enter a judgment against Defendants ESCO Technologies Inc. and ETS-Lindgren Inc. granting the following relief:

A. A judgment that ESCO Technologies Inc. and ETS-Lindgren Inc. have infringed the '170 Patent.

B. A permanent injunction prohibiting Defendants ESCO Technologies Inc. and ETS-Lindgren Inc., their officers, agents, servants, employees, attorneys, and those persons in active concert or participation with them who receive actual notice of the Order, from committing further acts of infringement;

C. An award of damages to Plaintiffs Microwave Vision, S.A., Satimo Industries, SAS, and Satimo USA, Inc., and an increase in damages under 28 U.S.C. § 284, together with prejudgment interest from the date the infringement began;

D. A finding that this case is "exceptional" within the meaning of 35 U.S.C. § 285, and an award to Plaintiffs Microwave Vision, S.A., Satimo Industries, SAS, and Satimo USA, Inc. of their reasonable attorney fees and expenses;

E. An award of costs to Plaintiffs Microwave Vision, S.A., Satimo Industries, SAS, and Satimo USA, Inc.; and

F. Such other and further relief as this Court deems proper and just.

JURY DEMAND

Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs hereby demand a trial by a jury on all issues so triable.

Respectfully submitted,

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Pro hac vice applications forthcoming