

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

Satellite Cooling, LLC, Plaintiff, v. Hill Phoenix, Inc., Defendant.	 	Case No. _____ Jury Trial Demanded
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COMPLAINT

Satellite Cooling, LLC (“Satellite”) brings this patent-infringement action against Hill Phoenix, Inc. (“Hillphoenix”). The asserted patent, U.S. Patent No. 5,921,096 (the “’096 patent”), claims an environmentally friendly refrigeration system that maintains consistent temperatures and is easy to maintain.

Parties

1. Satellite is an Illinois company with its principal place of business in Mundelein, Illinois.
2. Hillphoenix is a Delaware corporation with its principal place of business in Conyers, Georgia.

Jurisdiction and Venue

3. This action arises under the patent laws of the United States, 35 U.S.C. §§ 101 *et seq.*
4. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a).

5. This Court may exercise personal jurisdiction over Hillphoenix. Hillphoenix conducts continuous and systematic business in Illinois and this District. For example, Hillphoenix sells Second Nature Medium Temperature refrigeration systems in this District. This patent-infringement claim arises directly from Hillphoenix's continuous and systematic sales activity in this District. In short, this Court's exercise of jurisdiction over Hillphoenix would be consistent with the Illinois long-arm statute, 735 ILCS 5/2-209, and traditional notions of fair play and substantial justice.

6. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(b).

Claim of Patent Infringement

7. On July 13, 1999, the '096 patent issued to John S. Warren for an invention in a modular temperature maintaining food receptacle system. Satellite owns the '096 patent. A true and correct copy of the '096 patent is attached hereto as Exhibit A.

8. Hillphoenix has infringed and is still infringing the '096 patent by making, using, selling the modular temperature maintaining food receptacle systems that embody the patented invention, and Hillphoenix will continue to do so unless enjoined by this Court.

9. Satellite has complied with the statutory requirement of placing a notice of the '096 patent on all modular temperature maintaining food receptacle systems it manufactures and sells.

Prayer for Relief

WHEREFORE, Satellite Cooling prays for the following relief against Hillphoenix:

- (a) Judgment that Hillphoenix has directly infringed claims of the '096 patent claims;
- (b) For lost profits and a fair and reasonable royalty;
- (c) For an injunction;
- (d) For pre-judgment interest and post-judgment interest at the maximum rate allowed by law;
- (e) For such other and further relief as the Court may deem just and proper.

Demand for Jury Trial

Satellite demands a trial by jury on all matters and issues triable by jury.

Date: September 5, 2014

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