

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

JAMES C. SCHAEFER and
STORAGE CONTROL SYSTEMS, INC.,

Plaintiffs,

vs.

STOREX, B.V. and STOREX CA
CONTROLLED ATMOSPHERE, INC.,

Defendants.

Case No. 1:14-cv-01267-RJJ

Hon. Robert J. Jonker

**FIRST AMENDED COMPLAINT AND
JURY DEMAND**

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Plaintiffs complain against defendants as follows:

1. This is an action for patent infringement under Title 35 of the United States Code as to which this Court has jurisdiction pursuant to 28 U.S.C. § 1338. Venue lies under 28 U.S.C. § 1400.

2. Plaintiff James C. Schaefer is a citizen of Kent County, Michigan. Plaintiff Storage Control Systems, Inc. is a Michigan corporation based in Kent County, Michigan. Defendant Storex, B.V. is a Netherlands corporation. Defendant StorexCA Controlled Atmosphere, Inc. is a Canadian corporation.

3. United States Patent No. 8,739,694 (copy attached as Exhibit A) was duly issued on June 3, 2014. Until March 27, 2015, plaintiff Schaefer was the owner of the patent by assignment. On March 27, 2015, plaintiff Schaefer assigned all rights under the patent to plaintiff Storage Control Systems, Inc.

4. Defendants have infringed the patent by making, selling, using or offering to sell control systems that embody the patented invention, and defendants will continue to do so unless enjoined by this Court.

5. Plaintiffs have given defendants written notice of the infringement, and the infringement is willful.

WHEREFORE, plaintiffs requests that the Court award plaintiffs damages, enhanced damages, an injunction, interest, costs and attorney fees, and all additional relief to which plaintiffs are entitled.

JURY DEMAND

Plaintiffs demand a trial by jury.

WARNER NORCROSS & JUDD LLP

Dated: March 30, 2015

By: s/ James Moskal

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