

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

HOFFMAN ENCLOSURES INC., A
MINNESOTA CORPORATION,

Plaintiff,

v.

CHATSWORTH PRODUCTS, INC., A
DELAWARE CORPORATION,

Defendant.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Hoffman Enclosures Inc. (“Hoffman”) files this complaint against Chatsworth Products, Inc. (“Chatsworth”) and hereby alleges and states as follows:

PARTIES

1. Hoffman is a Minnesota corporation with its principal place of business at 2100 Hoffman Way, Anoka, MN 55303-1745.
2. Upon information and belief, Chatsworth is a Delaware corporation with its principal place of business at 29899 Agoura Road, Suite 12, Agoura Hills, CA 91301.

JURISDICTION AND VENUE

3. This is a civil action for patent infringement arising under the patent laws of the United States of America, 35 U.S.C. § 1, *et seq.*
4. This Court has subject matter jurisdiction over Hoffman's claim for patent infringement pursuant to 28 U.S.C. §§ 1331 and 1338(a).
5. The Court has personal jurisdiction over Chatsworth because Chatsworth is organized under the laws of Delaware.

6. Venue is proper in this Judicial District under 28 U.S.C. § 1391(b) and (c) and 1400(b) because Chatsworth is organized under the laws of Delaware and, on information and belief, has engaged in, and continues to engage in, infringing conduct in this District.

THE PATENT-IN-SUIT

7. U.S. Patent No. 8,464,396 (“the ’396 Patent”), titled “Removable Hidden Hinge Pin,” was issued by the United States Patent and Trademark Office on June 18, 2013. Hoffman is the owner by assignment of the entire right, title, and interest in the ’396 Patent, including the sole and undivided right to sue for infringement. A copy of the ’396 Patent is attached as Exhibit 1.

BACKGROUND

8. Hoffman is the leading provider of worldwide product and service solutions for enclosing, protecting, and cooling electrical and electronic systems, providing a broad variety of standard, modified, and engineered solutions to the commercial, communications, energy general electronics, industrial, infrastructure, medical, security, and defense markets.

9. Hoffman has sought and obtained patent protection for its innovative products, including its hinge designs. The ’396 Patent was filed on September 16, 2011 and issued on June 18, 2013. Hoffman has other issued and pending patents in the U.S. and elsewhere.

10. The ’396 Patent is generally directed to a hinge apparatus that can move between open and closed positions and includes a hinge body having a first and second portion, where each portion has a knuckle which together define a tubular opening when aligned. Additionally, either the first portion or the second portion of the hinge body can include a recess. The hinge apparatus also can include a hinge pin having an axial portion and a gripping portion that is offset from the axis of the hinge pin. The axial portion of the hinge pin can be inserted into the

tubular opening and the gripping portion inserted into the recess to inhibit access to the gripping portion when the hinge body is in the closed position while allowing it to be removed from the recess as the hinge body is moved to the open position.

11. Claim 1 of the '396 Patent is representative of the claims and recites:

1. A hinge apparatus configured to move between a closed position and an open position, the hinge apparatus comprising:

a hinge body including a first portion pivotally connected to a second portion, the first portion having a first knuckle portion and the second portion having a second knuckle portion, the first knuckle portion and the second knuckle portion defining a tubular opening when aligned, and one of the first portion and the second portion including a recess; and

a hinge pin including an axial portion and a gripping portion, the gripping portion being offset from an axis of the hinge pin;

the axial portion of the hinge pin being received by the tubular opening and the gripping portion of the hinge pin being received by the recess to inhibit access to the gripping portion when the hinge body is in the closed position, the gripping portion being removed from the recess as the hinge body is moved to the open position.

12. Chatsworth infringes the '396 Patent in violation of 35 U.S.C. § 271 through at least the manufacture, importation, offer to sell, and sale of what it refers to as the "RMR Swing Wall-Mount Enclosure" (the "RMR Enclosure") and the "CUBE-iT Wall-Mount Cabinet" (the "CUBE-iT Cabinet").

13. Publically-available information, including the following publications, provides evidence that the RMR Enclosure and the CUBE-iT Cabinet include hinges that infringe at least claim 1 of the '396 Patent:

- Chatsworth Products, Inc., "RMR Swing Wall-Mount Enclosure Data Sheet" ("RMR Data Sheet") attached as Exhibit 2 and available at:

http://www.chatsworth.com/uploadedfiles/files/rmr_swing_wall-mount_enclosure_datasheet.pdf.

- Chatsworth Products, Inc., “RMR Swing Wall-Mount Enclosure Installation Guide” (“RMR Installation Guide”) attached as Exhibit 3 and available at:

http://www.chatsworth.com/uploadedfiles/files/rmr_wall-mount_enclosure_user_manual_iis.pdf.

- Chatsworth Products, Inc., “CUBE-iT Wall-Mount Data Sheet” (“CUBE-iT Data Sheet”) attached as Exhibit 4 and available at:

http://www.chatsworth.com/uploadedfiles/files/cube-it_wall-mount_datasheet.pdf.

14. Additionally, to confirm that the RMR Enclosure and the CUBE-iT Cabinet included hinges that infringe at least claim 1 of the '396 Patent, Hoffman obtained an RMR Enclosure and a CUBE-iT Cabinet and analyzed the hinges that were on each. Photographs of the hinges of the RMR Enclosure and the CUBE-iT Cabinet obtained by Hoffman are reproduced below.

15. The front and back of the hinges that were removed from a RMR Enclosure obtained by Hoffman are shown by the photographs below:



16. The front and back of the hinges that were removed from a CUBE-iT Cabinet obtained by Hoffman are shown by the photographs below, with rear bolts removed:



17. Comparison of the hinges that were removed from the RMR Enclosure and the CUBE-iT Cabinet obtained by Hoffman indicates that the hinges are substantially identical, as shown by the photographs above.

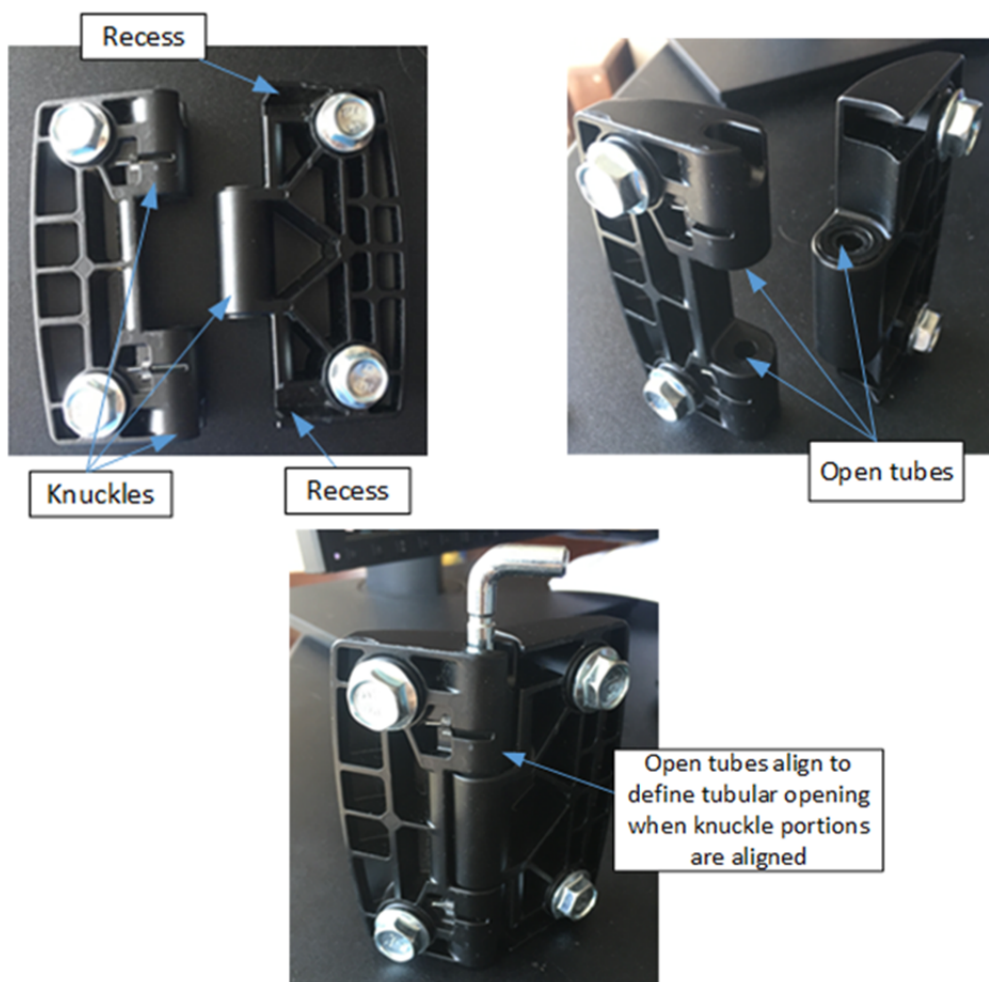
18. In particular, the hinges on the RMR Enclosure and the CUBE-iT Cabinet infringe claim 1 of the '396 Patent at least because the hinges meet each and every limitation of claim 1 literally.

19. Because the hinges that were removed from the RMR Enclosure and the CUBE-iT Cabinet obtained by Hoffman are substantially identical to each other, only the hinges that were removed from the RMR Enclosure are specifically discussed in detail in paragraphs 20 to 23, below. Each statement in paragraphs 20 to 23 with regard to the hinges that were removed from the RMR Enclosure, or with regard to the RMR Enclosure itself, applies equally to the hinges that were removed from the CUBE-iT Cabinet obtained by Hoffman or to the CUBE-iT Cabinet itself.

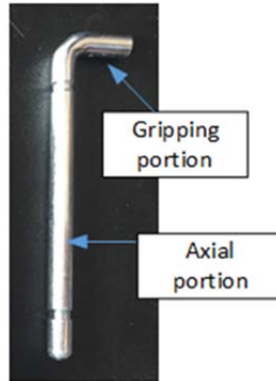
20. For example, the hinges that were removed from the RMR Enclosure are configured to move between a closed position and an open position as shown by the photographs below:



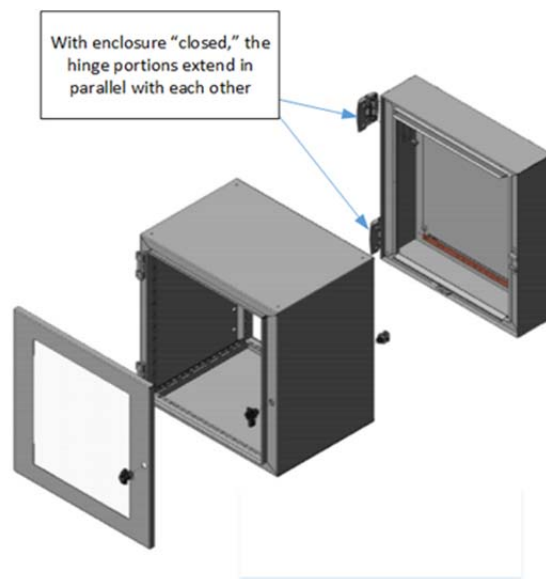
21. Further, as shown in the annotated photographs above and below, the hinges that were removed from the RMR Enclosure include a first portion that is pivotally connected to a second portion, where the first and second portions each have knuckle portions and define a tubular opening when aligned, and where either the first or second portion include a recess.



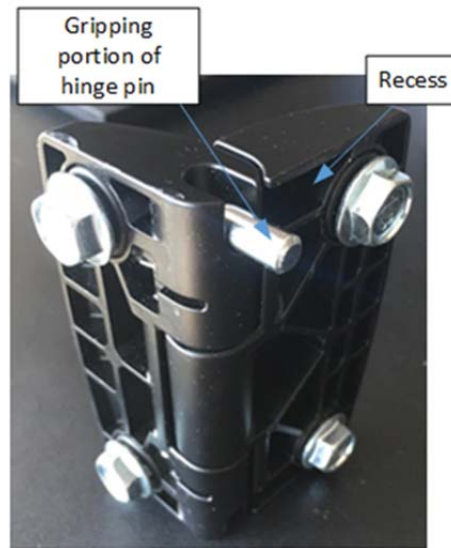
22. Additionally, the hinges that were removed from the RMR Enclosure include a hinge pin that has an axial portion and a gripping portion, where the gripping portion is offset from the axis of the hinge pin, as shown in the annotated photographs above and below:



23. Further, when the hinge is assembled and installed on the RMR Enclosure, the axial portion of the hinge pin is inserted into the tubular opening of the hinge while the gripping portion is inserted into the recess, thereby inhibiting access to the gripping portion when the hinge body is in the closed position and removing the gripping portion from the recess as the hinge body is moved to the open position, as shown by the figures and annotated photographs above and below.



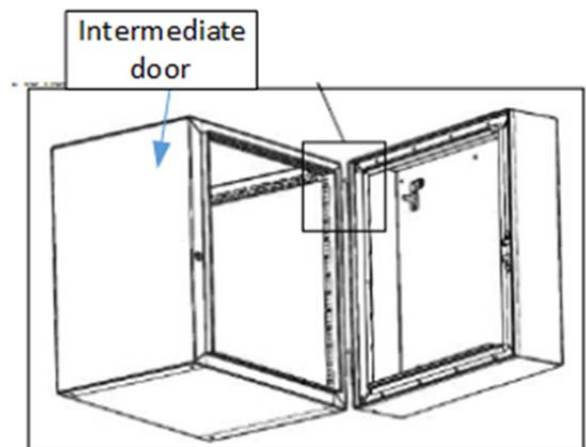
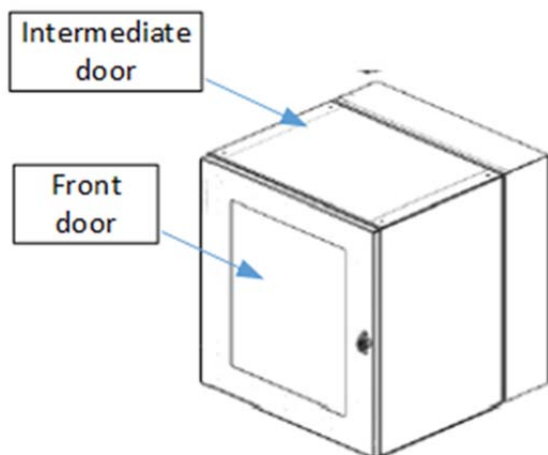
See Exhibit 2, RMR Data Sheet at 2. See also Exhibit 4, CUBE-iT Data Sheet at 1.



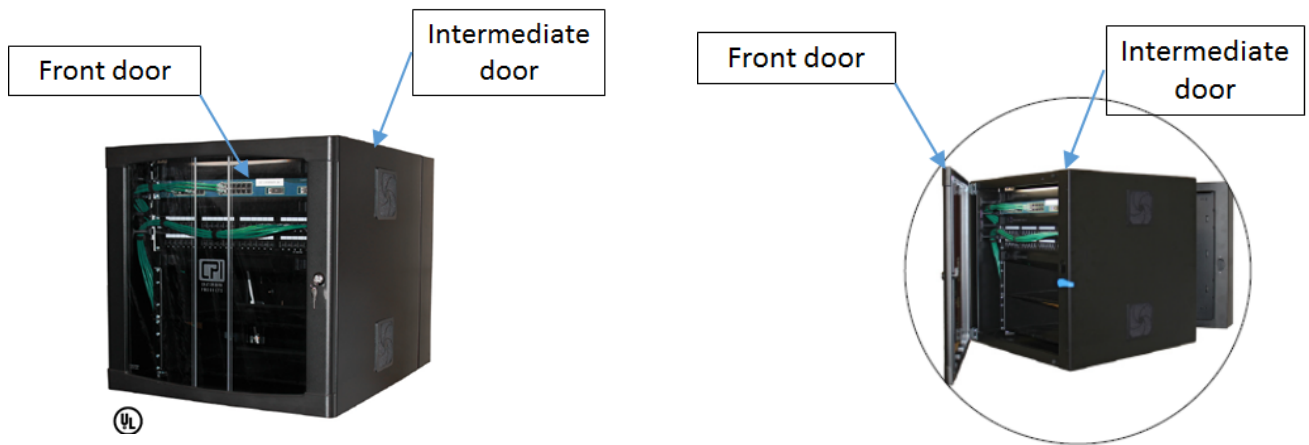
24. Additionally, as described above and below, the hinges that were removed from the RMR Enclosure or the RMR Enclosure itself further infringe claims 2-24 of the '396 Patent, as do the hinges that were removed from the CUBE-iT Cabinet or the CUBE-iT Cabinet itself.

25. Specifically, the hinges that were removed from the RMR Enclosure and the CUBE-iT Cabinet infringe claim 10 for the same reasons that they infringe claim 1.

26. Further the RMR Enclosure and the CUBE-iT Cabinet also infringe claim 17 for the same reasons the hinges infringe claims 1 and 10 and because the RMR Enclosure and the CUBE-iT Cabinet are each enclosures having a frame and a door that moves between an open and closed position as shown in the annotated figures below.



See Exhibit 3, RMR Installation Guide at 1, 8.

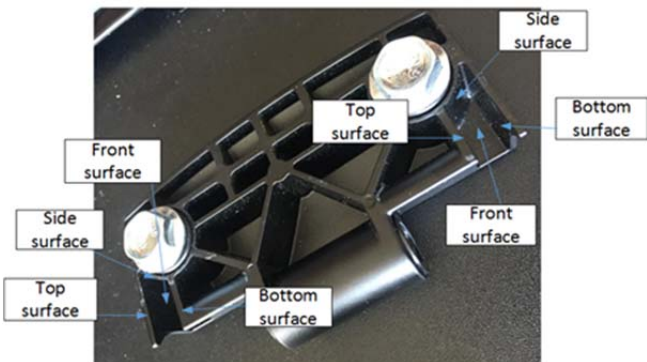


See Exhibit 4, CUBE-iT Data Sheet at 1.

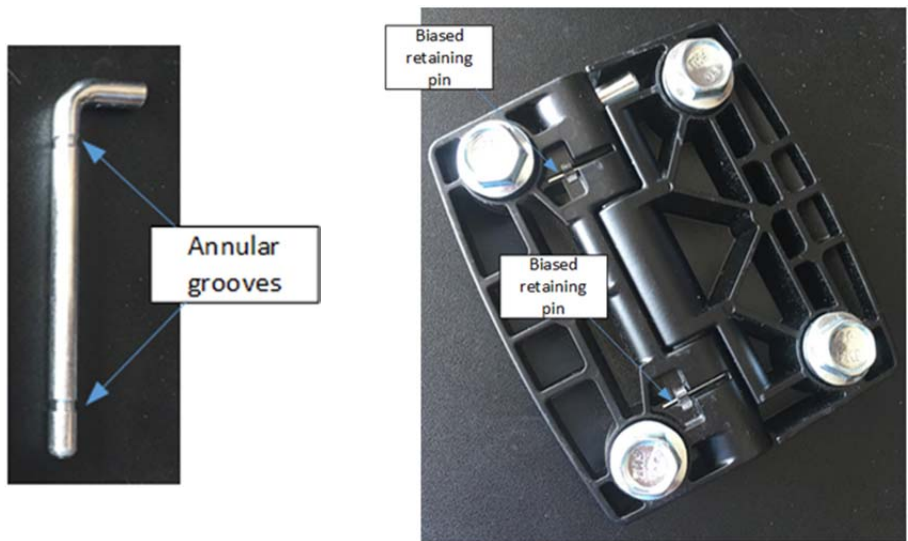
27. As above, because the hinges that were removed from the RMR Enclosure and the CUBE-iT Cabinet obtained by Hoffman are substantially identical to each other, only the hinges that were removed from the RMR Enclosure are specifically discussed in detail in paragraphs 28 to 37, below. Each statement in paragraphs 28 to 37 with regard to the hinges that were removed from the RMR Enclosure obtained by Hoffman, or with regard to the RMR Enclosure itself, applies equally to the hinges that were removed from the CUBE-iT Cabinet obtained by Hoffman or to the CUBE-iT Cabinet itself.

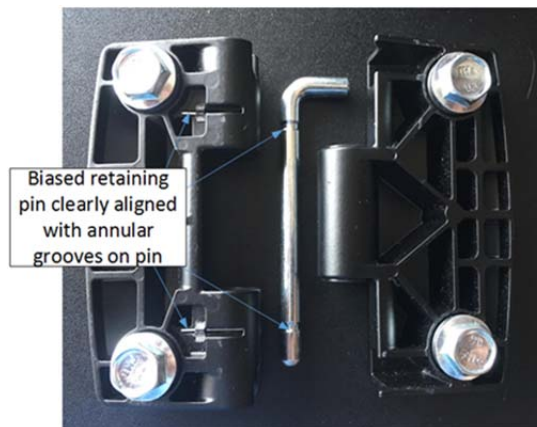
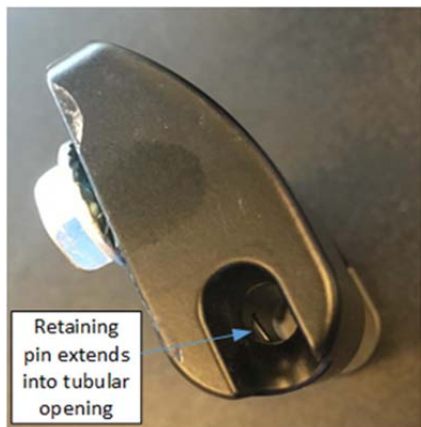
28. The hinges that were removed from the RMR Enclosure further infringe claims 2 and 11 of the '396 Patent and the RMR Enclosure infringes claim 18 because, as illustrated in the figures above, the recesses on the hinge are defined by the back surface of one of the hinge portions, where that surface is configured to be co-planar with the door of the RMR Enclosure.

29. The hinges that were removed from the RMR Enclosure further infringe claims 3, 12, and 19 of the '396 Patent because, as shown in the annotated photographs above and below, the hinges have top, bottom, side, and front surfaces that encapsulate the gripping portion of the hinge pin when the hinge is in the closed position.



30. The hinges that were removed from the RMR Enclosure further infringe claim 4 of the '396 Patent and the RMR Enclosure itself infringes claim 21 because, as shown in the annotated photographs above and below, the hinge pin has two annular grooves, where the hinges include a set of biased retaining pins set to one side of the hinge portions to engage the annular grooves and thereby help retain the hinge pin in the tubular opening of the hinge by providing some resistance against withdrawing the hinge pin from the tubular opening.





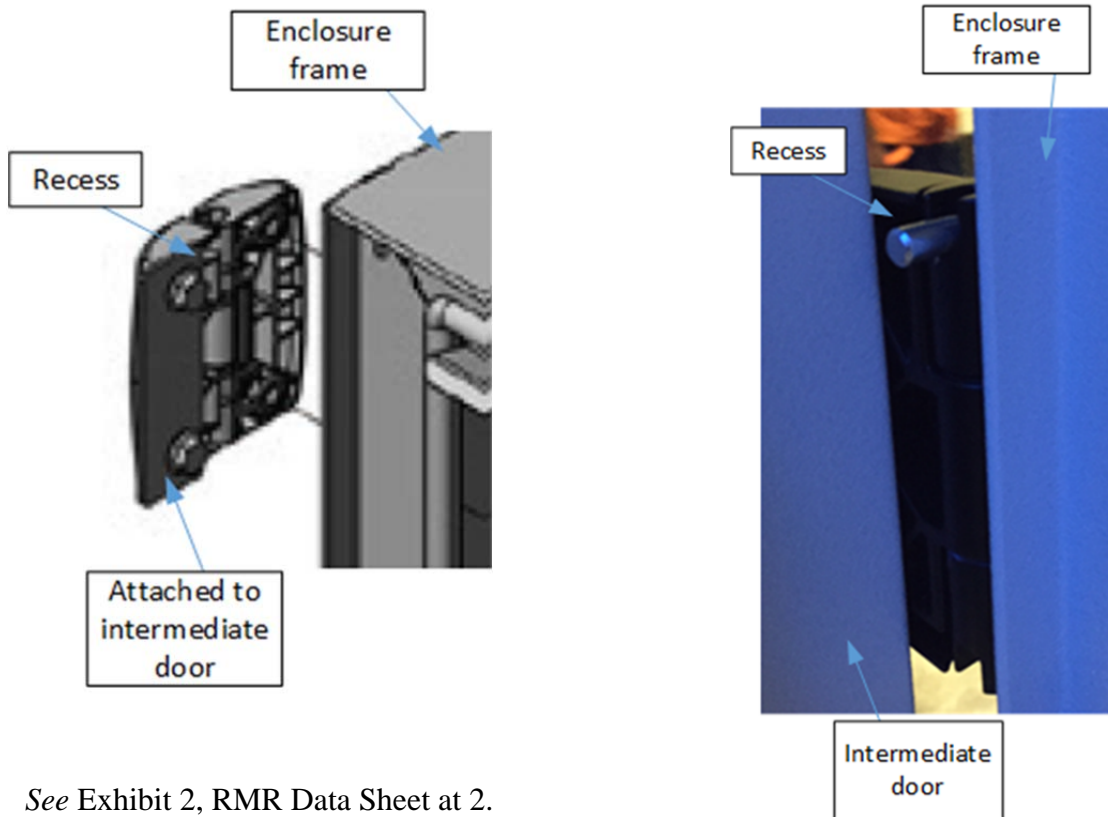
31. The hinges that were removed from the RMR Enclosure further infringe claim 5 of the '396 Patent because, as shown in the photographs provided above, the hinge pin has two annular grooves, where one of the hinge portions includes two retaining members that engage the shoulders of the annular grooves and provide resistance to disassembling the hinge.

32. The hinges that were removed from the RMR Enclosure further infringe claims 6, 13, and 14 of the '396 Patent and the RMR Enclosure itself infringes claim 20 because, as shown in the photographs provided above, a portion of each of the retaining pins extends into the tubular opening so that, when the hinge pin is inserted and initially contacts either retaining pin, the retaining pin moves out of the way and then snaps back into engagement with the relevant annular groove on the hinge, meaning that the retaining pins are biased towards the tubular opening.

33. The hinges that were removed from the RMR Enclosure further infringe claim 7 of the '396 Patent because, as shown in the annotated photographs above and below, the mounting holes in the hinge are configured to receive mounting screws, are formed on the back side of each of the hinge portions, and extend towards the front side of the hinge portions.



34. Similarly, the RMR Enclosure further infringes claim 22 of the '396 Patent for the same reasons the hinges infringe claim 7 and because the first portion of the hinge is attached to the door of the enclosure and the second portion of the hinge is attached to the frame of the enclosure as shown in the annotated figure and photograph below.

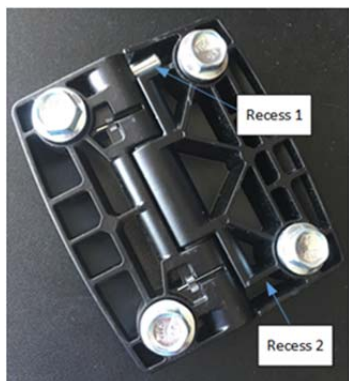


See Exhibit 2, RMR Data Sheet at 2.

35. The hinges that were removed from the RMR Enclosure further infringe claims 8 and 15 of the '396 Patent because, as shown in the annotated photographs above and below, the mounting holes of the hinge do not extend completely through to the front of the hinge portions.



36. The hinges that were removed from the RMR Enclosure further infringe claims 9 and 16 of the '396 Patent and the RMR Enclosure itself infringes claim 23 because, as shown in the annotated photographs above and below, the hinge includes two recesses so that the hinge pin can be inserted in opposite directions, thereby resulting in a reversible hinge apparatus.



37. Finally, the RMR Enclosure further infringes claim 24 of the '396 Patent because the hinge (and thus the hinge pin) is installed exterior to the enclosure frame and the intermediate door as shown in the figures above.

CLAIM FOR RELIEF - PATENT INFRINGEMENT
UNDER 35 U.S.C. § 271 OF U.S. PATENT NO. 8,464,396

38. Hoffman incorporates by reference the allegations of paragraphs 1-37 of this Complaint as if fully set forth herein.

39. In view of the foregoing, Chatsworth infringes the '396 Patent in violation of 35 U.S.C. § 271(a).

40. Hoffman has complied with 35 U.S.C. § 287.

41. Accordingly, Chatsworth has had at least constructive knowledge of the '396 Patent.

42. Chatsworth's acts therefore have been and are now willful, with knowledge of or reason to know that they constitute infringement of the '396 Patent.

43. Chatsworth will continue its acts of infringement unless and until enjoined by this Court.

44. Chatsworth's infringement has caused and, unless enjoined by this Court, will continue to cause serious and irreparable damages to Hoffman for which Hoffman has no adequate remedy at law.

45. Chatsworth's infringement has also caused monetary damage to Hoffman for which Hoffman is entitled to be compensated under 35 U.S.C. § 284, including a reasonable royalty and/or lost profits.

46. Due to Chatsworth's willful infringement and the exceptional nature of this case, Hoffman is entitled to recover attorneys' fees under 35 U.S.C. § 285.

PRAYER FOR RELIEF

WHEREFORE, Hoffman prays that judgment be entered by this Court in its favor and against Chatsworth as follows:

a. That Chatsworth, and all other persons, firms, or corporations acting in concert or participation with Chatsworth, be enjoined and restrained, during the pendency of this action and permanently thereafter, from making, using, importing, offering for sale, or selling any and all goods which infringes the '396 Patent;

b. That Hoffman recover damages sustained, including lost profits and/or a reasonable royalty, as a result of Chatsworth's infringement of the '396 Patent, pursuant to 35 U.S.C. § 284;

c. That Chatsworth's infringement be adjudged to be willful, its infringing conduct adjudged egregious, and that Hoffman's damages be trebled or otherwise enhanced, pursuant to 35 U.S.C. §§ 284 and 285 and all other applicable statutes and rules in common law that would be appropriate, with pre- and post-judgment interest thereon;

d. That Chatsworth's infringement be adjudged to be willful and this case declared exceptional, and that Hoffman recover its reasonable costs, expenses, and attorney fees, pursuant to 35 U.S.C. §§ 284 and 285 and all other applicable statutes and rules in common law that would be appropriate, with pre- and post-judgment interest thereon; and

f. That Hoffman be granted such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Fed. R. Civ. P. 38 and District of Delaware Local Rule 38.1, Plaintiff Hoffman hereby demands a jury trial as to all issues that are so triable.

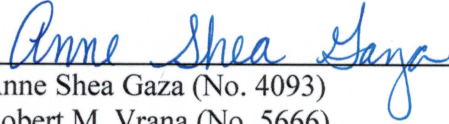
Dated: July 13, 2018

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