

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROBROY INDUSTRIES, INC.,	)	
	)	Civil Action No.
Plaintiff,	)	
	)	<b>JURY TRIAL DEMANDED</b>
v.	)	
	)	
THOMAS & BETTS CORPORATION,	)	
	)	
Defendant.	)	

**COMPLAINT**

Plaintiff Robroy Industries, Inc. (“Robroy”), through its counsel, hereby alleges the following for its Complaint against Thomas & Betts Corporation (“Thomas & Betts”):

1. This is a civil action for the infringement of United States Patent No. 5,621,189 entitled “Coated Conduit Outlet Fitting” (“the ‘189 patent”). This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1338(a). Venue is proper under 28 U.S.C. §§ 1391(b), 1391(c) and 1400(b).

2. Plaintiff Robroy is a Pennsylvania corporation, having its principal place of business in Verona, Pennsylvania.

3. On information and belief, Defendant Thomas & Betts is a Delaware corporation, having its principal place of business in Memphis, Tennessee. Defendant Thomas & Betts does business in this District.

4. Robroy is the owner, by assignment, of the ‘189 patent which was duly and lawfully issued by the United States Patent and Trademark Office on April 15, 1997. A true and correct copy of the ‘189 patent is attached hereto as Exhibit A.

5. Upon information and belief, Thomas & Betts is manufacturing, selling and/or offering to sell products that infringe the claims of the '189 patent under 35 U.S.C. § 271. Thomas & Betts is directly infringing, contributorily infringing and/or inducing the infringement of the '189 patent. Thomas & Betts will continue to infringe the '189 patent unless enjoined by this Court.

6. Robroy has placed the required statutory notice on the products manufactured and sold by Robroy which embody the invention of the '189 patent. Robroy has also placed Thomas & Betts on actual notice of its infringing activities.

7. Thomas & Betts' activities in infringing the '189 patent are willful and wanton, constituting willful infringement of such United States Patent under 35 U.S.C. § 285.

8. Robroy has been irreparably damaged and will continue to be irreparably damaged by reason of Thomas & Betts' infringement of the '189 patent unless this Court restrains the infringing acts of Thomas & Betts. Robroy is without an adequate remedy at law.

WHEREFORE, Plaintiff Robroy Industries, Inc. prays:

A. that Defendant Thomas & Betts, its officers, employees, agents, and those persons in active participation with them be permanently enjoined from infringing United States Patent No. 5,621,189;

B. that a decree be entered adjudging that Defendant Thomas & Betts infringed United States Patent No. 5,621,189 and that such infringement was willful;

C. that Defendant Thomas & Betts be ordered to pay damages to Robroy pursuant to 35 U.S.C. § 284, including interest from the dates of infringement, resulting from Defendant Thomas & Betts' infringement of United States Patent No. 5,621,189;

D. that Defendant Thomas & Betts be ordered to pay to Robroy treble damages pursuant to 35 U.S.C. § 284, resulting from Defendant Thomas & Betts' willful infringement of United States Patent No. 5,621,189;

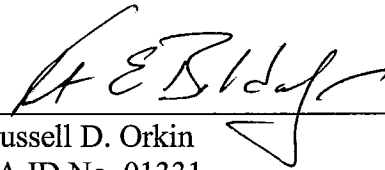
E. that Plaintiff Robroy be awarded its costs of this action and reasonable attorneys' fees pursuant to 35 U.S.C. § 284 and 285; and

F. that Plaintiff Robroy be awarded such further relief as this Court may deem just and proper.

**DEMAND FOR JURY TRIAL**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Plaintiff Robroy hereby demands a trial by jury for all issues triable by a jury.

Respectfully submitted,



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Dated: September 27, 2010

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