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5. Schreiber owns and has standing to sue for infringement of United States Letters Patent Nos. 5,440,860 ("the '860 patent"); 5,701,724 ("the '724 patent"); and 6,085,680 ("the '680 patent"). These patents are collectively referred to as "the Schreiber's Patents", Exhibits A-C, respectively, and were duly and legally issued by the United States Patent and Trademark Office on the dates indicated on the cover page of each patent.

6. LOL has committed direct acts of infringement of Schreiber's '860, '724 and '680 Patents by using machines for individual wrapping of cheese singles ("IWS") manufactured by Kustner Industries, S.A. of Switzerland, known as model KE and KD machines.

7. LOL was aware of Schreiber's '860 and '724 patents and had notice of its infringement through use of the Kustner KE/KD machines no later than May, 1998, yet LOL has continued to use the infringing Kustner machines.

8. LOL's infringement is, therefore, willful, intentional and deliberate.

9. Schreiber has been damaged by the infringing acts of the defendant.

10. The defendant's infringement will continue to injure Schreiber until this Court enters an injunction prohibiting further infringement and specifically enjoining further manufacture, use and sale of the infringing Kustner machines.

WHEREFORE, Schreiber demands judgment against LOL, its affiliates, officers, agents, servants, employees, and all persons in active concert or participation with them, as follows:

A. A preliminary and a permanent injunction prohibiting the defendant from further acts of infringement of the Schreiber patents;

B. An award to Schreiber of such damages as it shall prove at trial against the defendant, after a full accounting for all damages caused Schreiber by LOL's unlawful conduct, said damages to include lost profits but in no event less than a reasonable royalty;

C. An award to Schreiber for all damages so determined for willful infringement, pursuant to 35 USC § 284, together with prejudgment interest;

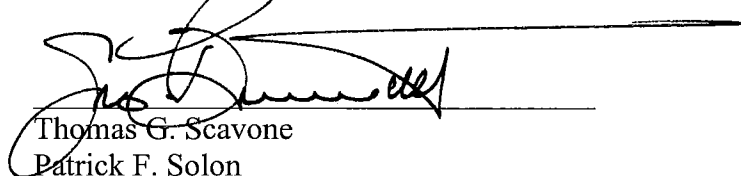
D. An award to Schreiber of the cost of this action and its reasonable attorneys' fees; and

E. Such other relief as this Court or a jury may determine to be proper and just.

Jury Demand

A trial by jury is hereby demanded on all issues triable to a jury in this case.

Respectfully submitted,



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