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JAMES BONINI  
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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

2010 JUN -1 P 2: 59

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

\_\_\_\_\_  
 Safelite Fulfillment Inc., )  
 Glass Medic, Inc., and Belron )  
 Technical Ltd., )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 Ramhuset-Dalaspoglar AB, )  
 )  
 Defendant. )  
 \_\_\_\_\_

**JURY TRIAL DEMANDED**

**2 : 10 cv 492**

**JUDGE SARGUS**

**MAGISTRATE JUDGE KING**

**COMPLAINT**

Plaintiffs Safelite Fulfillment Inc., Glass Medic, Inc. and Belron Technical Ltd.

(collectively "Safelite") allege as follows:

**Parties**

1. Plaintiff Safelite Fulfillment Inc. is a Delaware corporation with a primary place of business at 2400 Farmers Drive, Columbus, Ohio 43235.
2. Plaintiff Glass Medic, Inc. is a Pennsylvania corporation with a primary place of business at 6295 Maxtown Road, Westerville, Ohio 43082.
3. Belron Technical Ltd. is a British company with a principal place of business at Unit 1, Singer Way, Bedford, MK42 7AW, United Kingdom.
4. Defendant Ramhuset-Dalaspoglar AB ("Ramhuset") is a Swedish company with a principal place of business at Sturegatan 67, SE-791 62 Falun, Sweden.

**Jurisdiction and Venue**

5. This action includes counts seeking declaratory judgment relief under 28 U.S.C. §§ 2201, and 2202, concerning issues relating to alleged patent infringement arising under the patent laws of the United States, Title 35 of the United States Code.

6. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331, 1338(a), 2201, and 2202.

7. Venue with this court is appropriate pursuant to 28 U.S.C. § 1391(d).

**Count I**  
**Declaratory Judgment of Invalidity and**  
**Noninfringement of U.S. Patent No. 7,618,023**

8. Paragraphs 1–6 are incorporated into this count by reference.

9. Upon information and belief, Ramhuset is the record owner of U.S. Patent No. 7,618,023 (“the ‘023 patent”).

10. In a letter dated December 9, 2009, Ramhuset accused Safelite of infringing the claims of the ‘023 patent by making, using or selling a product used to remove windshields from automobiles.

11. Ramhuset’s accusation of infringement creates a substantial controversy between the parties of sufficient immediacy and reality to warrant the issuance of a declaratory judgment.

12. The ‘023 patent is invalid because of failure to meet the conditions of patentability and/or otherwise comply with the requirements of the patent laws including, *inter alia* and without limitation, 35 U.S.C. §§ 102, 103, and/or 112.

13. Safelite has not infringed any valid claim of the ‘023 patent.

**Demand for a Jury Trial**

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Safelite demands a trial by jury of all issues so triable.

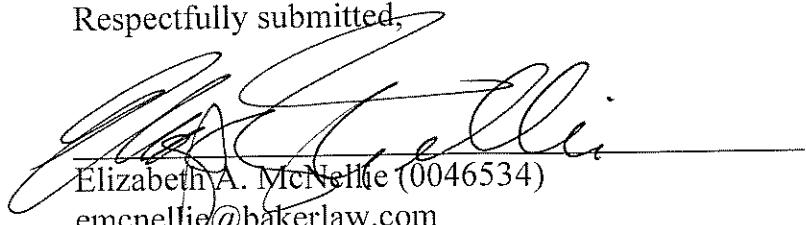
**Prayer for Relief**

WHEREFORE, Safelite respectfully demands the following relief:

- a. a judgment declaring that U.S. Patent No. 7,618,023 is invalid and not infringed by Safelite;
- b. a judgment enjoining Ramhuset, and its officers, agents, servants, subcontractors, employees, and others controlled by Ramhuset, from making further allegations or claims that Safelite has infringed any of the patents-in-suit;
- c. an order declaring that Ramhuset pay Safelite's attorneys' fees and costs incurred in connection with this lawsuit, if this case is found to be exceptional under 35 U.S.C. § 285; and
- d. an order granting Safelite such further relief as this Court deems just and proper.

Respectfully submitted,

Dated: June 1, 2010



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