

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

|                                       |   |                  |
|---------------------------------------|---|------------------|
| STAHL'S INC., d/b/a GroupeSTAHL,      | ) | CIVIL ACTION NO. |
| a Michigan corporation, and STAHL'S   | ) |                  |
| SPECIAL PROJECTS, INC., d/b/a STAHL'S | ) |                  |
| HOTRONIX, a Pennsylvania corporation, | ) |                  |
|                                       | ) |                  |
| Plaintiffs,                           | ) |                  |
|                                       | ) |                  |
| v.                                    | ) |                  |
|                                       | ) |                  |
| GEO KNIGHT & CO., INC.                | ) |                  |
|                                       | ) |                  |
| Defendant.                            | ) |                  |

**COMPLAINT FOR PATENT INFRINGEMENT AND DEMAND FOR JURY TRIAL**

Plaintiffs Stahls' Inc. d/b/a GroupeSTAHL ("GroupeSTAHL") and Stahls' Special Projects, Inc. d/b/a Stahls' Hotronix ("Hotronix"), for their Complaint against Defendant, Geo Knight & Co., Inc. ("Geo Knight") allege as follows:

**The Parties**

1. Plaintiff GroupeSTAHL is a Michigan corporation having a place of business at 20600 Stephens Street, St. Clair Shores, MI 48080.
2. Plaintiff Hotronix is Pennsylvania corporation having a place of business at One Stahl Drive, Masontown, PA 15461.
3. Defendant, Geo Knight & Co., Inc. is a Massachusetts corporation, having a place of business at 52 Perkins Street, Brockton, MA, 02302.

**Jurisdiction and Venue**

4. This is an action for patent infringement under the patent laws of the United States, Title 35, United States Code.

5. This Court has subject matter jurisdiction under 28 U.S.C. § 1338(a).

6. Venue is proper before this Court under 28 U.S.C. §§ 1391(b)-(c) and/or 1400 (b).

**Infringement of U.S. Patent No. 5,435,883**

7. On July 25, 1995 United States Patent No. 5,435,883 (“the ’883 patent”) duly and legally issued. The ’833 patent is valid and enforceable. A copy of the ’883 patent is attached hereto as Exhibit A.

8. Plaintiff GroupeSTAHL owns the ’883 patent.

9. Plaintiff Hotronix is the exclusive licensee of the ’883 patent.

10. Upon information and belief, Geo Knight has directly infringed, and is still directly infringing, the ’883 patent in violation of 35 U.S.C. § 271 by manufacturing, using, offering for sale, selling and/or importing products within and outside of this judicial district, such products including but not limited to the DK20 heat press, which is covered by at least one claim of the ’883 patent.

11. Upon information and belief, Geo Knight has indirectly infringed, and is still indirectly infringing the ’883 patent by contributing to the direct infringement of its customers and/or by inducing its customers to directly infringe the ’883 patent.

12. Plaintiffs have been irreparably damaged and will continue to be irreparably damaged by Geo Knight’s infringement unless this Court enjoins Geo Knight from continuing its infringement.

**Prayer For Relief**

Wherefore, Plaintiffs pray for the entry of judgment from the Court that:

- (a) United States Patent No. 5,435,883 was duly and legally issued, and is valid and enforceable;
- (b) Defendant has directly and contributorily infringed United States Patent No. 5,435,883, and has actively induced others to infringe this patent;
- (c) Defendant, and those acting in active concert, be preliminarily and permanently enjoined from engaging in any further acts of infringement of United States Patent No. 5,435,883;
- (d) Plaintiffs be awarded damages adequate to compensate for the infringement by Defendant pursuant to 35 U.S.C. § 284, together with pre-judgment interest;
- (e) The infringement by Defendant has been such as to render this action exceptional, and Plaintiffs be awarded its reasonable attorney's fees, pursuant to 35 U.S.C. § 285;
- (f) Plaintiffs be awarded its costs and expenses reasonably incurred in bringing and prosecuting this action; and
- (g) Plaintiffs be awarded such other and further relief as this Court may deem to be right and just.

**Demand for Jury Trial**

Plaintiffs hereby make demand for a trial by jury pursuant to Rule 38 of the Federal Rules of Civil Procedure as to all issues of this lawsuit.

Respectfully submitted,

DUANE MORRIS LLP  
Attorneys for Plaintiffs

Dated: October 29, 2008

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