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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

Safety Rail Source, LLC,	:	
	:	
Plaintiff,	:	CIVIL ACTION NO. 06 -
	:	
v.	:	COMPLAINT
	:	
The Bilco Company,	:	
	:	
Defendant.	:	

Plaintiff, for its complaint against the Defendant, alleges and avers as follows:

THE PARTIES AND JURISDICTION

1. Plaintiff, Safety Rail Source, LLC (“SAFETY RAIL”), is a Pennsylvania limited liability company having an address of P.O. Box 200, Harleysville, Pennsylvania 19438.
2. Defendant, The Bilco Company (“BILCO”), is a Connecticut corporation, having a place of business at 37 Water Street, West Haven, Connecticut 06516.

3. This Court has jurisdiction over this complaint under 28 U.S.C. §§1331 and 1338(a) in that the cause of action arises under the Patent Laws of the United States, and particularly, 35 U.S.C. §271. Venue is proper in this judicial district pursuant to 28 U.S.C. §§1400(b) and 1391(c).

#### PATENT INFRINGEMENT

4. On October 22, 2002, U.S. Patent No. 6,467,230 duly and legally issued to Kee Klamp Limited of Reading, England, for an invention entitled “Interconnection Device and Method for Securing a Safety Rail” (the “Patent”). A copy of the Patent is attached hereto as Exhibit A.

5. On or about October 24, 2006, the Patent and all accrued causes of action based thereon were assigned to SAFETY RAIL by Kee Klamp Limited.

6. In contravention to 35 U.S.C. §§271(a)(b) and (c), BILCO has infringed the Patent by making, using, selling, and/or offer to sell, or inducing others to make, use sell, and/or offer to sell products embodying the invention claimed in Claims 1, 2 and 8 of the Patent. Such acts of infringement have occurred and continue to occur without the authority or license of Plaintiff.

WHEREFORE, Plaintiff prays for judgment against BILCO as follows:

A. That, pursuant to 35 U.S.C. §283, preliminary and final injunctions be issued enjoining BILCO, its officers, agents, servants, employees and all those persons in active concert or participation with them from further infringement of the Patent;

B. That, pursuant to 35 U.S.C. §284, BILCO account to Plaintiff for damages for all past infringement, including treble damages because of the willful nature of such infringement;

C. That, pursuant to 35 U.S.C. §285, Plaintiff be awarded costs and attorney's fees incurred in connection with this action; and

D. That Plaintiff have such other and further relief as this Court deems just and proper.

NORMAN E. LEHRER, P.C.

By: /s/ Norman E. Lehrer  
Norman E. Lehrer  
Attorneys for Plaintiff

Dated: November 20, 2006