

at issuance to Cosco Management, Inc. ("CMI"). A true and correct copy is attached as Exhibit A. CMI licenses that patent exclusively to DJG.

6. On September 2, 2003, United States Patent No. 6,612,649 ("the '649 patent") entitled "Juvenile Vehicle Seat Cup Holder" was duly and legally issued to James M. Kain and assigned at issuance to CMI. A true and correct copy is attached as Exhibit B. CMI licenses that patent exclusively to DJG.

DEFENDANT'S INFRINGEMENT

7. Graco has been and still is infringing the '862 and '649 patents by making, selling, and using juvenile vehicle seats embodying the patented inventions or inducing the infringement by others of the '862 and '649 patents and will continue to do so unless enjoined by this Court.

THE HARM TO PLAINTIFFS

8. Graco has caused or will cause, by Graco's infringing conduct and its inducement of infringement by others, irreparable harm to DJG for which there is no adequate remedy at law.

9. Upon information and belief, Graco has engaged in its conduct willfully and in complete disregard of, or with indifference to, DJG's rights and interests.

10. DJG has suffered or will suffer damage as a result of Graco's infringement to date.

11. This is an exceptional case as that term is defined in 35 U.S.C. § 285.

WHEREFORE, DJG prays that this Court:

1. Permanently enjoin Graco and its officers, agents, servants, employees, and attorneys, and those in active concert or participation with them who receive actual notice of the Order, from importing, manufacturing, using, selling and/or offering for sale devices which infringe the '862 or '649 patents.

2. Issue an Order directing Graco and its officers, agents, servants, employees, and attorneys, and those acting in concert and participation with them who receive actual notice of the order, to destroy all molds, machines, tooling, or other equipment used in the manufacture of items infringing the '862 or '649 patents.

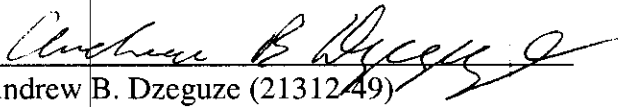
3. Award DJG monetary damages adequate to compensate them for past infringement consistent with 35 U.S.C. § 284, up to and including treble the amount of actual damages assessed, together with costs and prejudgment interest.

4. Award DJG its reasonable attorneys' fees pursuant to 35 U.S.C. § 285.

5. Grant and award any and all relief found necessary and proper under these circumstances.

JURY DEMAND

DJG requests a trial by jury on its claims.


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