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13 14	Attorneys for Plaintiff Halo Electronics, Inc.					
	UNITED STATES DISTRICT COURT					
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15 16		STRICT OF NE				
		STRICT OF NI				
16	DI	STRICT OF NI 2:0' FIR	EVADA 7-cv-00331 ST AMENDED C	OMPLAINT FOR		
16 17	DI HALO ELECTRONICS, INC.,	STRICT OF NI 2:0' FIR	E VADA 7-cv-00331			
16 17 18 19 20	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C	MENT		
16 17 18 19 20 21	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC.,	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
 16 17 18 19 20 21 22 	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
16 17 18 19 20 21	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC.,	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
 16 17 18 19 20 21 22 23 	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC., Defendants.	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
 16 17 18 19 20 21 22 23 24 	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC., Defendants.	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
 16 17 18 19 20 21 22 23 24 25 	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC., Defendants.	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
 16 17 18 19 20 21 22 23 24 25 26 	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC., Defendants.	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		
 16 17 18 19 20 21 22 23 24 25 26 27 	DI HALO ELECTRONICS, INC., Plaintiff, v. BEL FUSE INC., PULSE ENGINEERING, INC., and TECHNITROL, INC., Defendants.	STRICT OF NI 2:0' FIR PA'	EVADA 7-cv-00331 ST AMENDED C TENT INFRINGE	MENT		

FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff, Halo Electronics, Inc. files this First Amended Complaint and demand for jury trial seeking relief for patent infringement by the Defendants. Halo Electronics, Inc. states and alleges the following:

JURISDICTION AND VENUE

1.This is an action for patent infringement arising under patent laws of the UnitedStates, 35 U.S.C. §§ 100 *et seq*. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§1331 and 1338(a).

9 2. This court has personal jurisdiction over each of the Defendants because each
10 Defendant has substantial and continuous contact within this judicial district and/or because each
11 Defendant has committed acts of patent infringement within this judicial district, including placing
12 infringing products into the stream of commerce under circumstances such that each Defendant
13 reasonably should have anticipated being subject to suit in this judicial district. The Court also has
14 personal jurisdiction over each of the Defendants because the acts of patent infringement are aimed
15 at this judicial district and/or have effect in this judicial district.

3. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and (c) and 1400(b).

THE PARTIES

 4. Plaintiff Halo Electronics, Inc. ("Halo") is a corporation organized and existing under the laws of the state of Nevada, and having its principal place of business at 3005 East Post Road
 Front, Las Vegas, Nevada.

5. Defendant Bel Fuse Inc. is a corporation organized and existing under the laws of the state of New Jersey. Bel Fuse Inc.'s headquarters is located at 206 Van Vorst Street, Jersey City, New Jersey.

6. Defendant Pulse Engineering, Inc. is a corporation organized and existing under the
laws of the state of Delaware. Pulse Engineering, Inc.'s worldwide headquarters is located at 12220
World Trade Drive, San Diego, California.

7. Defendant Technitrol, Inc. is a corporation organized and existing under the laws of
 the state of Pennsylvania. Technitrol, Inc.'s corporate headquarters is located at 1210 Northbrook
 Drive, Suite 470, Trevose, Pennsylvania.

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Defendant Pulse Engineering, Inc. is a subsidiary of Technitrol, Inc.

<u>COUNT I</u> (Patent Infringement)

9. Halo restates and realleges the preceding paragraphs of this First Amended Complaint.

9 10. On August 12, 1997, United States Patent No. 5,656,985 ("the '985 patent") entitled
10 "Electronic Surface Mount Package" was duly and legally issued by the United States Patent and
11 Trademark Office. Halo owns the '985 patent by assignment. A true and correct copy of the '985
12 patent is attached as Exhibit A.

13 11. On October 2, 2001, United States Patent No. 6,297,720 ("the '720 patent") entitled
14 "Electronic Surface Mount Package" was duly and legally issued by the United States Patent and
15 Trademark Office. Halo owns the '720 patent by assignment. A true and correct copy of the '720
16 patent is attached as Exhibit B.

17 12. On October 2, 2001, United States Patent No. 6,297,721 ("the '721 patent") entitled
18 "Electronic Surface Mount Package" was duly and legally issued by the United States Patent and
19 Trademark Office. Halo owns the '721 patent by assignment. A true and correct copy of the '721
20 patent is attached as Exhibit C to this Complaint.

13. On November 20, 2001, United States Patent No. 6,320,489 ("the '489 patent"),
entitled "Electronic Surface Mount Package With Extended Side Retaining Wall," was duly and
legally issued by the United States Patent and Trademark Office. Halo owns the '489 patent by
assignment. A true and correct copy of the '489 patent is attached as Exhibit D.

14. On February 5, 2002, United States Patent No. 6,344,785 ("the '785 patent"),
entitled "Electronic Surface Mount Package," was duly and legally issued by the United States
Patent and Trademark Office. Halo owns the '785 patent by assignment. A true and correct copy
of the '785 patent is attached as Exhibit E.

1 15. On December 16, 2003, United States Patent No. 6,662,431 ("the '431 patent"),
 2 entitled "Electronic Surface Mount Package," was duly and legally issued by the United States
 3 Patent and Trademark Office. Halo owns the '431 patent by assignment. A true and correct copy
 4 of the '431 patent is attached as Exhibit F.

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16. Defendant Bel Fuse, Inc. has been and is infringing, actively inducing others to infringe, and/or contributing to the infringement of the '985, '720, '721, '489, '785, and '431 patents by making, using, selling, and/or offering to sell surface-mount transformers embodying the patented inventions and/or devices that have or contain an electronic surface-mount package embodying the patented inventions, including, but not limited to, part number S558-5500-12-F.

10 17. Defendants Pulse Engineering, Inc. and Technitrol, Inc. have been and are
infringing, actively inducing others to infringe, and/or contributing to the infringement of the '985,
12 '720, '721, '489, '785, and '431 patents by making, using, selling, and/or offering to sell surfacemount transformers embodying the patented inventions and/or devices that have or contain an
electronic surface-mount package embodying the patented inventions, including, but not limited to,
part numbers H1102NL and HX1188NL.

18. Upon information and belief, Defendants have been and are infringing the '985, '720, '721, '489, '785, and '431 patents with knowledge of one or more of the patents, and thus Defendants' infringement is willful.

19. Upon information and belief, Defendants will continue to infringe the '985, '720,'721, '489, '785, and '431 patents unless and until they are enjoined by this Court.

20. The Defendants have caused and will continue to cause Halo irreparable injury and
damage by infringing the '985, '720, '721, '489, '785, and '431 patents. Halo will suffer further
irreparable injury, for which it has no adequate remedy at law, unless and until the Defendants are
enjoined from infringing the '985, '720, '721, '489, '785, and '431 patents.

PRAYER FOR RELIEF

WHEREFORE, Halo respectfully requests that this Court:

27 (1) Enter judgment that Defendants have infringed the '985, '720, '721, '489, '785, and
28 '431 patents;

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1	(2)	Enter an order permanently enjoining Defendants and their officers, agents,			
2	employees, attorneys, and all persons in active concert or participation with any of them, from				
3	infringing the '985, '720, '721, '489, '785, and '431 patents;				
4	(3)	Award Halo damages in an amount sufficient to compensate it for Defendants'			
5	infringement of the '985, '720, '721, '489, '785, and '431 patents, together with prejudgment and				
6	post-judgment interest and costs under 35 U.S.C. § 284;				
7	(4)	(4) Treble the damages awarded to Halo under 35 U.S.C. § 284 by reason of			
8	Defendants'	willful infringement of the '985, '720, '721, '489, '785, and '431 patents;			
9	(5)	Declare this case to be "exceptional" under 35 U.S.C. § 285 and award Halo its			
10	attorney fees,	, expenses, and costs incurred in this action; and			
11	(6)	Award Halo such other and further relief as this Court deems just and proper.			
12		JURY TRIAL DEMAND			
13	Halo demands a trial by trial on all issues appropriately triable by a jury.				
14					
15	Dated: July 27, 2007 FISH & RICHARDSON P.C.				
16					
17		By: <u>/s/ William R. Woodford</u> William R. Woodford			
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19		Attorney for Plaintiff HALO ELECTRONICS, INC.			
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1	CERTIFICATE OF SERVICE				
2	I certify that on July 27, 2007, I caused a true and correct copy of the FIRST AMENDED				
3	COMPLAINT FOR PATENT INFRINGEMENT to be filed electronically with the Clerk of				
4	Court through ECF, and ECF will send an email notice of the electronic filing to the following:				
5	Jason Firth – <u>firthj@gtlaw.com</u> CDEENDEDC TRAUDIC, LLD Rol Fuce, Inc.				
6	GREENBERG TRAURIG, LLP Bel Fuse, Inc. 3773 Howard Hughes Parkway				
7	Suite 500 North Las Vegas, NV 89169				
8	Joshua L. Raskin – <u>jraskin@wolfblock.com</u> Counsel for Defendant				
9	Martin G. Raskin – <u>mraskin@wolfblock.com</u> Bel Fuse, Inc. WOLF BLOCK SCHORR AND				
10	SOLIS-COHEN LLP 250 Park Avenue				
11	New York, NY 10177				
12	Kelly A. Evans - kevans@swlaw.com Counsel for Defendants David Swanson Driver, and on the series of the				
13	Paul Swenson Prior - sprior@swlaw.com Pulse Engineering, Inc. andSNELL & WILMER L.L.P.Technitrol, Inc.				
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15	Las Vegas, NV 89169				
16	David E. Sipiora – desipiora@townsend.comCounsel for DefendantsKristopher L. Reed – klreed@townsend.comPulse Engineering, Inc. and				
17	TOWNSEND AND TOWNSEND AND CREW LLP				
18	1200 17 th Street, Suite 2700 Denver, CO 80202				
19	Deliver, CO 80202				
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21					
22	/s/ William R. Woodford William R. Woodford				
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