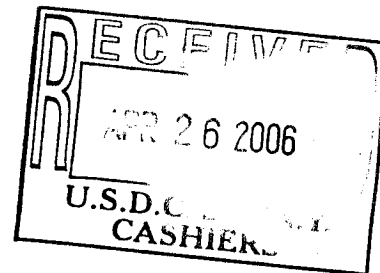


06 CV 3211

KAVANAGH MALONEY & OSNATO LLP
Attorneys for Plaintiff
415 Madison Avenue
New York, N.Y. 10017
212-207-8400
James J. Maloney (JJM 5313)



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

MULTISTACK LLC,

06 Civ. ()

Plaintiff,

-against-

JURY DEMAND

ARCTICHILL INC., 200 PARK INC.,
FREEZE CO. SYSTEMS LIMITED, and
MWSK EQUIPMENT CORP.,

Defendants.

-----X

COMPLAINT FOR PATENT INFRINGEMENT

Now comes the Plaintiff, Multistack LLC (hereinafter Multistack), through its attorneys and for its Complaint for Patent Infringement states:

1. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §1 et seq.

THE PARTIES

2. Multistack is a Minnesota limited liability company organized and existing under the laws of the State of Minnesota, having a principal place of business in Wisconsin.

3. Defendant Arctichill Inc. is a corporation organized and existing under the laws of the State of South Carolina, having a principal place of business in South Carolina. This Defendant manufactures, sells, distributes and provides technical support for devices that infringe the patent in suit (hereinafter "Infringing Devices").

4. Defendant 200 Park, Inc., is a corporation organized and existing under the laws of the State of South Carolina, having a principal place of business in South Carolina. This Defendant manufactures, imports, sells, distributes, services, and provides technical support for Infringing Devices directly and through various related business entities.

5. Defendant Freeze Co. Systems Limited is a corporation organized and existing under the laws of Ontario, Canada, having a principal place of business in Ontario. This Defendant manufactures, sells, exports to the United States and eventually to the present District, and provides technical support for Infringing Devices.

6. Defendant MWSK Equipment Corp is a corporation organized and existing under the laws of the State of New York, having a principal place of business in New York. This Defendant sells, distributes and provides technical support for Infringing Devices.

7. All of the above named individual Defendants are collectively referred to herein as "Defendants."

JURISDICTION AND VENUE

8. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §1331 and §1338.

9. Venue properly lies in this District under 28 U.S.C. §1391 and §1400 because the Defendants have committed acts of infringement in this District.

ACTS OF PATENT INFRINGEMENT

10. Multistack is the owner of U.S. Patent No. 4,852,362 (hereinafter "the Patent"). Multistack is the owner of the patent through an assignment from Multistack, Inc.

11. Defendants, individually, separately or together, have infringed and continue to directly infringe, contribute to the infringement, and induce the infringement of the Patent in this District and elsewhere by manufacturing, making, using, offering for sale, selling, installing, technically supporting and/or maintaining equipment and systems which embody or employ one or more claims of the Patent.

12. Defendants' infringement has been deliberate, willful, intentional and with full knowledge of the existence of the Patent in that each has persisted in their infringement of the Patent.

13. Defendants' individual and collective infringements have caused and will continue to cause Plaintiff substantial damage and irreparable injury by virtue of their continuing infringement of the Patent. Plaintiff will continue to suffer damages and irreparable injury unless and until Defendants are enjoined by this Court from continuing such infringement and specifically enjoining any further making, using, selling, and related activities covered by the Patent.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully requests that Judgment be entered in favor of Plaintiff and against each one of the Defendants, their subsidiaries, affiliates, agents, employees, and all persons in active concert or participation with them, and that Plaintiff be granted the following relief:

(i) Entry of a preliminary and a permanent injunction restraining each of the Defendants, their officers, agents, employees and all persons in active concert or participation with Defendants from further acts of infringement of the Patent, pursuant to 35 U.S.C. §283;

(ii) An award of damages sufficient to compensate Plaintiff for Defendants' infringement of the Patent, in an amount not less than a reasonable royalty, pursuant to 35 U.S.C. §284;

(iii) An award of prejudgment interest, pursuant to 35 U.S.C. §284;

(iv) An award of increased damages in an amount not less than three times the amount of damages found by the jury or assessed by this Court, for Defendants' willful infringement, pursuant to 35 U.S.C. §284; and

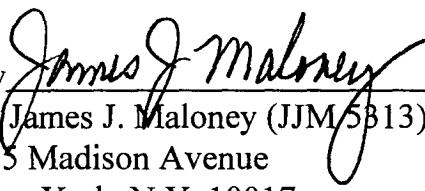
(v) An award of reasonable attorney's fees, pursuant to 35 U.S.C. §285, and Plaintiff's cost of suit, pursuant to 35 U.S. C. §284; and

(vi) Such other and further relief as this Court and/or a jury may deem appropriate.

Dated: New York, N.Y.
April 20, 2006

ORUM & ROTH LLC
53 West Jackson Boulevard
Chicago, Illinois 60604
312-922-6262
Attorneys for Plaintiff

KAVANAGH MALONEY & OSNATO LLP

By 
James J. Maloney (JJM/5813)
415 Madison Avenue
New York, N.Y. 10017
212-207-8400
Local Counsel for Plaintiff

Plaintiff hereby demands trial by jury.