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MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION 8

DIGITAL INNOVATIONS LLC.,
An Illinois Limited Liability Company,

Plaintiff,

V.

COMPLAINT

SORENSEN RESEARCH & JUDGE MORAN
DEVELOPMENT TRUST,

Defendant

Defendant

Defendant

# COMPLAINT FOR DECLARATORY RELIEF

Plaintiff, DIGITAL INNOVATIONS LLC. (hercinafter referred to as "Plaintiff"), for its Complaint against Defendant SORENSEN RESEARCH & DEVELOPMENT TRUST (hereinafter referred to as "Defendant"), alleges as follows:

- 1. This is an action for Declaratory Judgment and other relief brought under the Federal Declaratory Judgment Act, 28 U.S.C. §§ 2201-02.
- Plaintiff, Digital Innovations LLC, is a limited liability company organized and existing under the laws of the State of Illinois, having a principal place of business at 3436 N.
   Kennicott, Suite 200, Arlington Heights, IL 60004.
- 3. Upon information and belief, Defendant Sorensen is a trust entity organized, administered, and existing under the laws of California, having a principal place of business at 14431 Bellvista Drive, Rancho Santa Fe, California 92067. On information and belief, Sorensen is in the business of acquiring and holding patents, including those purportedly covering inventions of Mr. Jens O. Sorensen, and seeking licenses for such patents.

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- 4. This Court has jurisdiction over the subject matter of this action on the following grounds:
  - (a) 28 U.S.C. § 1331, this being a civil action arising under the laws of the United States, namely, the Federal Patent Act, as provided for by 35 U.S.C. § 100, et. seq.;
  - (b) 28 U.S.C. § 1337(a), this being a civil action arising under an Act of Congress regulating commerce and protecting trade and commerce;
  - (c) 28 U.S.C. § 1338(a), this being a civil action arising under an Act of Congress relating to alleged patent rights; and
  - (d) 28 U.S.C. § 1332, this being a civil action between citizens of different states in which the amount in controversy exceeds seventy-five thousand dollars (\$75,000.00) exclusive of interest and costs.
- 5. This Court may declare the rights and other legal relations of the parties in this case under 28 U.S.C. § 2201, and Rule 57, Fed.R.Civ.P., because an actual and justiciable controversy exists concerning the rights of, and legal relations between, Plaintiff and Defendant.
- 6. This Court has personal jurisdiction over Defendant consistent with the principles underlying the U.S. Constitution and Illinois Statutes, 735 ILCS §5/2-209, because, among other things, any injury caused to Plaintiff occurred in the State of Illinois as a result of Defendant's actions within the State of Illinois and this District. Sorensen sent letters to this State and District threatening Plaintiff with possible litigation and thus creating a reasonable apprehension of suit by Sorensen against Plaintiff. Additionally, upon information and belief, Defendant is transacting business in this State and District, including its business of seeking patent licenses from Plaintiff and possibly others.
  - 7. Venue is proper in this Court under the provisions of 28 U.S.C. §§ 1391 and/or

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1400 because, among other things, (a) this is an action arising out of allegations of patent infringement, (b) Plaintiff is in this District, (c) a substantial part of the events giving rise to Plaintiff's claims occurred in this District, and (d) on information and belief, Defendant is subject to personal jurisdiction in this District.

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- 8. Defendant Sorensen has alleged that it owns rights in U.S. Patent No. 4,935,184, entitled "Stabilized Injection Molding When Using a Common Mold Part With Separate Complementary Mold Parts" and issued on June 19, 1990 (hereinafter referred to as "the '184 patent"). A copy of the '184 patent is attached hereto as Exhibit 1.
- 9. In a letter dated April 29, 2005 (hereinafter referred to as "the April 29 letter"), Defendant Sorensen, through its attorney, J. Michael Kaler, alleged that Plaintiff's "CLEAN DR—SCREEN CLEANER product (hereinafter referred to as "the Accused Product") includes a plastic housing that is "substantially likely to be fabricated utilizing a process that infringes" the '184 patent.
- 10. In the April 29 letter, Sorensen also stated that it "is prepared to discuss reasonable terms for a license that would allow DIGITAL INNOVATIONS to continue to practice the '184 process in the manufacture of its products." Sorensen later stated that it "is prepared to withdraw the assertion of infringement with respect to any product for which we are provided sufficient proof demonstrating that the process actually used to make the product does not infringe the' 184 patent." In particular, in order that it may withdraw its assertion of infringement, Sorensen requested that Plaintiff respond to the following questions with respect to the Accused Process:
  - "1. Was each plastic component of each housing molded in a different and distinct injection-molding machine?
  - Was the first molded plastic component manually moved between the different molding machines by hand?

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3. Were no two plastic components of the plastic housing fabricated with any shared mold part?"

11. Sorensen indicated in the April 29 letter that "[i]f DIGITAL INNOVATIONS asserts that any Accused Product is not made with two mold cavities sharing one common mold part," or if Plaintiff provides a "yes" response to each of the above-quoted questions, this would indicate that the Accused Product is not made by a process that infringes the '184 patent. On July 13, 2005, Sorensen's attorney sent a further letter to Plaintiff, reiterating its assertion of infringement and again offering a license under the '184 patent.

- 12. On or about August 9, 2005, after a diligent and reasonable investigation into Sorensen's allegations, Plaintiff responded to Sorensen via letter written by its counsel (hereinafter referred to as "the August 9 letter") stating Plaintiff respectfully declines the offer of a license and that Digital is not infringing the '184 patent, nor importing products made in accordance with the methods claimed in the '184 patent. Additionally, Plaintiff answered "yes" to the three posed questions.
- 13. The Accused Product does not infringe the' 184 patent because, *inter alia*, the plastic components thereof are molded in different and wholly distinct injection-molding machines without using molds with shared mold parts, and the components are manually moved between the different molding machines during manufacture.
- 14. In view of Plaintiff's non-infringement of the '184 patent, Plaintiff indicated in the August 9 letter that Sorensen did not have a reasonable basis to further pursue its infringement claim.

- 15. By letter dated August 17, 2005, Sorensen's attorney indicated that it would not withdraw its assertions of infringement of the '184 patent based on the information provided in the August 9 letter, instead demanding "conclusively legally admissible evidence" of non-infringement and demanding that an officer of Plaintiff sign a declaration prepared by Sorensen with "absolutely no changes" to the text of the Declaration.
- Plaintiff responded through its attorney in a letter dated August 24, 2005, that the request for the Declaration was highly unusual and inappropriate, particularly where Sorensen had failed to provide any proof whatsoever of its unsubstantiated charges of infringement.
- 17. In a letter dated August 26, 2005, Sorensen's attorney again insisted on the signed Declaration and threatened infringement.
- 18. Plaintiff, through its attorney, again replied by letter to Sorensen, reiterating its position and pointing out Sorensen's lack of foundation for its claim.
- 19. In a letter dated November 4, 2005, Sorensen's attorney continued to assert Sorensen's claim of infringement under the '184 patent and gave Digital a deadline of December 7, 2005, to submit the Declaration, otherwise it would "proceed to initiate legal proceedings for patent infringement without further notice."
- 20. At no time did Sorensen provide any evidence to Plaintiff showing that Plaintiff infringed the '184 patent.
- 21. The Accused Product does not infringe any valid and enforceable rights of Sorensen in the '184 patent.
- 22. There is an actual, substantial, and justiciable controversy between Plaintiff and Defendant of sufficient immediacy and reality to warrant the rendering of a declaratory judgment by this Court. Defendant Sorensen has made a clear threat against Plaintiff's business sufficient

to create in Plaintiff a reasonable apprehension of suit by Sorensen concerning its alleged patent rights. Plaintiff is entitled to a judgment declaring its rights as requested herein.

### COUNT I

# DECLARATORY JUDGMENT REGARDING ALLEGATIONS OF PATENT INFRINGEMENT

- 23. Plaintiff incorporates by reference paragraphs 1 through 21 above as if set forth fully herein.
- 24. There is an actual, substantial, and justiciable controversy between Plaintiff and Defendant Sorensen concerning Sorensen's allegations that Plaintiff has infringed the 184 patent.
- 25. On information and belief, the Accused Product does not infringe the' 184 patent, as alleged by Sorensen.
- 26. Plaintiff is entitled to a judgment declaring that the Accused Product does not infringe the' 184 patent.
- 27. Plaintiff is entitled to a judgment declaring that any and all making, using, selling, offering for sale, and/or importing into the United States the Accused Product is and has been lawful, and otherwise declaring that Plaintiff has not infringed whatever rights, if any, that Defendant Sorensen may hold in the 184 patent.
- As a direct and proximate result of Sorensen's allegations of patent infringement,

  Plaintiff is suffering irreparable injury to its reputation and goodwill in an amount that cannot

  presently be ascertained and cannot be compensated adequately by monetary relief alone.

WHEREFORE, Plaintiff Digital Innovations LLC, prays that this Court enter judgment:

(a) Declaring that Plaintiff has not infringed any purported patent rights of Sorensen in the 184 patent, or otherwise violated any provision of the patent laws of the

United States, in connection with the Accused Product or any other product made, used, imported, sold and/or offered for sale by Plaintiff.

- (b) Permanently enjoining Sorensen, its successors, assigns, and any other related persons and/or entities from asserting the' 184 patent against Plaintiff in connection with the Accused Product or any other product made, used, imported, sold and/or offered for sale by Plaintiff.
- (c) Finding in favor of Plaintiff and declaring this case to be exceptional pursuant to 35 U.S.C. § 285;
- (d) Awarding Plaintiff, its attorneys' fees and other costs and expenses;
- (e) Awarding interest to Plaintiff to the extent permitted by law; and
- (f) Awarding to Plaintiff such further relief as the Court deems just and proper.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

This 9<sup>th</sup> day of November, 2005.

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ATTORNEYS FOR PLAINTIFF, DIGITAL INNOVATIONS LLC Case: 1:05-cv-06428 Document #: 1 Filed: 11/09/05 Page 8 of 20 PageID #:8

California

# United States Patent [19]

### Sorensen

[11] Patent Number:

4,935,184

[45] Date of Patent:

Jun. 19, 1990

[54]	STABILIZED INJECTION MOLDING WHEN
	USING A COMMON MOLD PART WITH
	SEPARATE COMPLIMENTARY MOLD
	PARTS

[75] Inventor: Jens O. Sorensen, Rancho Santa Fe,

Calif,

[73] Assignee: Printee, Rancho Santa Fe, Calif.

[21] Appl. No.: 386,012

[22] Filed: Jul. 27, 1989

#### Related U.S. Application Data

[63]	Continuation of Ser. N. doned.	No. 152,670,	Feb. 5,	1988,	aban-
	TONCH.				

[51]	Int. CL <sup>5</sup> B29C 45/16
[52]	U.S. Cl 264/246; 264/255;
	264/328.8; 425/129.1
[58]	Field of Search 264/245, 246, 255, 328.1.

264/328.8, 328.11, 328.12; 425/127, 129.1, 130 [56] References Cited

#### U.S. PATENT DOCUMENTS

3,737,272 3,832,110 4,381,275 4,422,995 4,459,256	6/1973 8/1974 4/1983 12/1983 7/1984	Cooper         264/246           Segmuiler         425/248           Hehl         425/130           Sorensen         264/328.8           Schad         425/129.1           Ziegler         264/242
4,508,676	4/1985	Sorensen 264/328.8

#### FOREIGN PATENT DOCUMENTS

17577 1/1972 Australia .

#### OTHER PUBLICATIONS

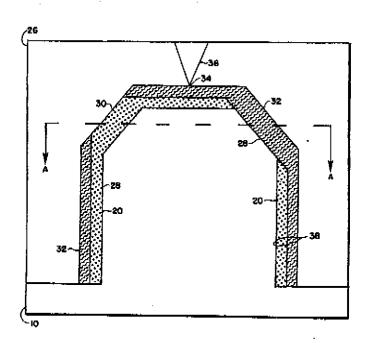
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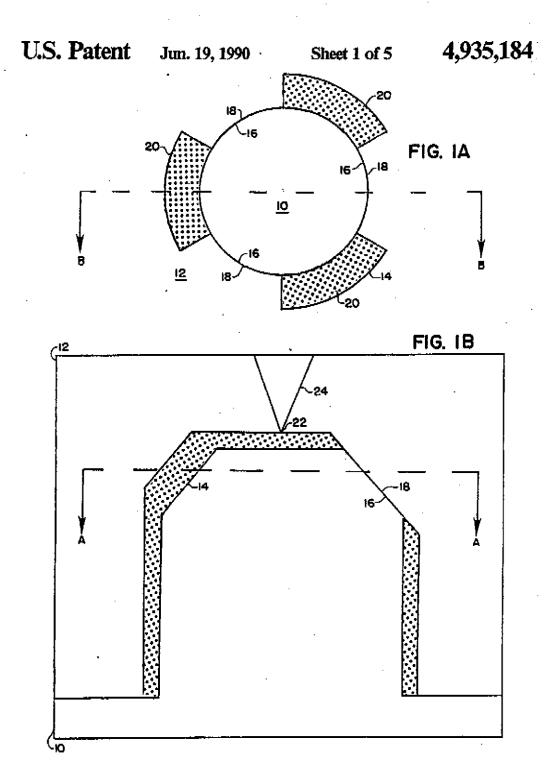
Primary Examiner-Jill L. Heitbrink Attorney, Agent, or Firm-Edward W. Callan

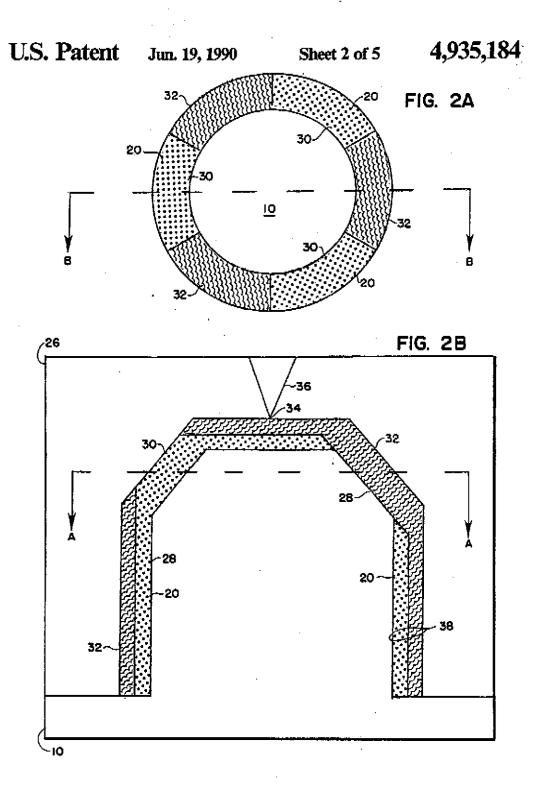
57] ABSTRACT

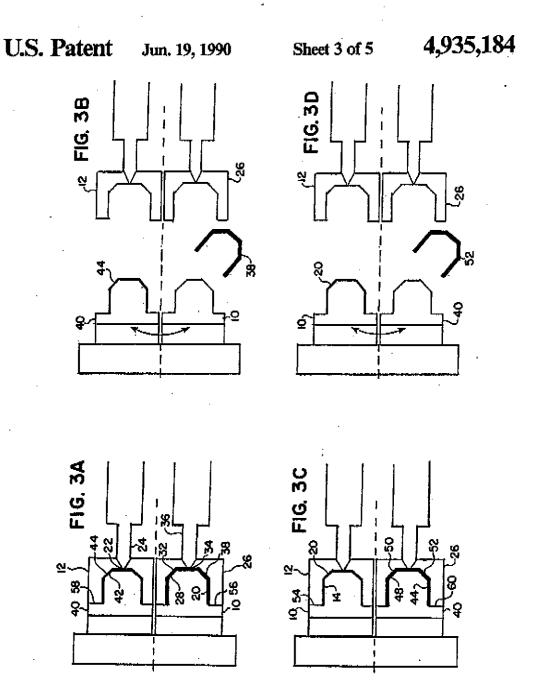
A process for injection molding plastic products having a closed end and an open end with laminated walls terminating in a rim at the open end. A first common mold part is combined with a first complementary mold part to assemble a first mold cavity in which the first plastic material is injected until it reaches the portion of the first mold cavity that defines the rim of the product. Portions of the first complementary mold part contact portions of the first common mold part to rigidly secure the mold parts in position in relation to each other in order to impede movement of the mold parts in relation to each other during injection of a first plastic material into the first mold cavity. The first plastic material is shaped such that when it is contained after solidification in a second mold cavity it provides one or more stabilizing regions that rigidly secure the first common mold part in position in relation to the second complementary mold part in order to impede movement of such mold parts in relation to each other during the injection of a second plastic material into the second mold cavity. A second plastic material having different characteristics than the first plastic material is injected until it reaches the portion of the second mold cavity that defines the rim of the product to form a laminated wall.

10 Claims, 5 Drawing Sheets

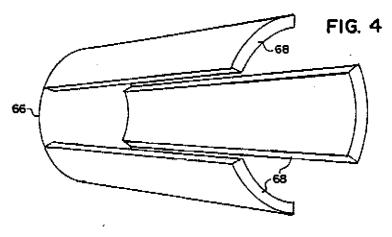


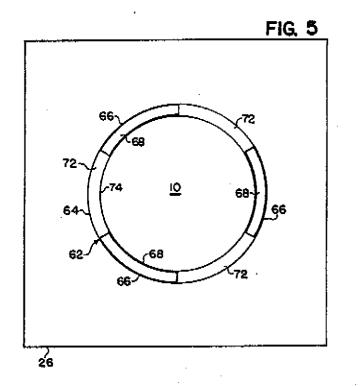


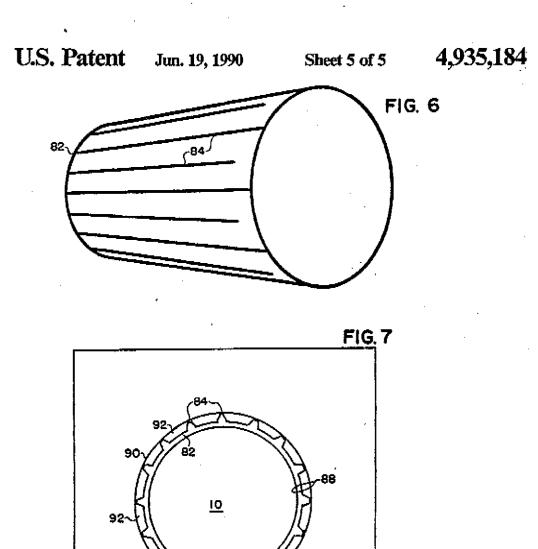




U.S. Patent Jun. 19, 1990 Sheet 4 of 5 4,935,184







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#### STABILIZED INJECTION MOLDING WHEN USING A COMMON MOLD PART WITH SEPARATE COMPLIMENTARY MOLD PARTS

This is a continuation of co-pending application Ser. No. 07/152,670 filed on Feb. 5, 1988 now abandoned.

#### BACKGROUND OF THE INVENTION

molding of plastic products and is particularly directed to stabilizing the dimensions of mold cavities during the injection steps when using a common mold part and at least two complementary mold parts to assemble separate mold cavities for receiving separate injections of 15 plastic materials to produce a thin-walled, hollow plastic product.

The use of a common mold part with at least two complementary mold parts to provide separate mold cavities for receiving separate injections of plastic mate- 20 rials for producing a hollow plastic product is known. In one known prior art method of cyclic injection molding a hollow plastic product, a first mold cavity is defined by a first common mold part and a first complementary mold part; and a second mold cavity is defined 25 by the first common mold part and a second complementary mold part. The method includes the steps of:

(a) combining the first common mold part with the first complementary mold part to assemble the first mold cavity:

(b) injecting a first plastic material into the first mold cavity;

(c) solidifying the injected first plastic material to form a first plastic material component;

(d) combining the first common mold part with the 35 second complementary mold part to assemble the second mold cavity with the first plastic material component attached to the first common mold part so that when the second mold cavity is assembled the first plastic material component is contained within the sec- 40 that when the first plastic material component is so ond mold cavity;

(e) injecting a second plastic material into the second mold cavity while the first plastic material component is contained therein; and

(f) solidifying the injected second plastic material so 45 as to form a second plastic material component that fuses with the first plastic material component to produce a hollow plastic product.

It also is known to expand upon this method by further using a third mold cavity defined by a second com- 50 mon mold part and the first complementary mold part, and a fourth mold cavity defined by the second common mold part and the second complementary mold part. The method further includes the steps of:

(h) during step (d), combining the second common 55 mold part with the first complementary mold part to assemble the third mold cavity;

(i) during step (e), injecting a third plastic material into the third mold cavity;

(j) during step (f), solidifying the injected third plastic 60 material to form a third plastic material component;

(k) during step (a), combining the second common mold part with the second complementary mold part to assemble the fourth mold cavity with the third plastic material attached to the second common mold part so 65 that when the fourth mold cavity is assembled the third plastic material is contained within the fourth mold cavity:

(1) during step (b), injecting the fourth plastic material into the fourth mold cavity while the solidified third plastic material is contained therein; and

(m) during step (c), solidifying the injected fourth 5 plastic material so as to form a fourth plastic material component that fuses with the third plastic material to produce a second said hollow plastic product.

This method has been used for producing hollow plastic products having composite walls of separately The present invention generally pertains to injection 10 injected plastic materials. In performing such method, the first plastic material is injected until it reaches the parting line between the first common mold part and the first complementary mold part; the second plastic material is injected until it reaches the parting line between the first common mold part and the second complementary mold part; the third plastic material is injected until it reaches the parting line between the second common mold part and the first complementary mold part; and the fourth plastic material is injecteduntil it reaches the parting line between the second common mold part and the second complementary

Typically, all four plastic materials are the same.

#### SUMMARY OF THE INVENTION

The present invention provides a method and apparatus for injecting molding hollow, thin-walled plastic products, having a closed end and an open end with laminated walls terminating in a rim at the open end, 30 where relative movement between the common mold part and the complementary mold parts is impeded during injection of the plastic materials.

According to the present invention, the first and second plastic materials have different characteristics, and in the injection molding method described above, the step of solidifying the injected first plastic material to form the first plastic material component (step (c))

includes the step of

(g) shaping the first plastic material component such contained in the second mold cavity the first plastic material component provides one or more stabilizing regions that rigidly secure the first common mold part in position in relation to the second complementary mold part in order to impede movement of the first common mold part in relation to the second complementary mold part during the injection of the second plastic material into the second mold cavity, to thereby produce a thin-walled plastic product having controlled dimension in that the wall-thickness dimensions of the second mold cavity are stabilized by the stabilizing regions.

The step of injecting the first plastic material into the first mold cavity (step (b)) includes the step of

(h) injecting the first plastic material until it reaches the portion of the first mold cavity that defines the rim of the product; and

the step of injecting the second plastic material into the second mold cavity (step (e)) includes the step of

(i) injecting the second plastic material until it reaches the portion of the second mold cavity that defines the rim of the product.

When the method of the present invention utilizes two common mold cavities, such as described above, the step of solidifying the injected third plastic material to form the third plastic material component (step (j)) includes the step of shaping the third plastic material component such that when the third plastic material 3

component is so contained in the fourth mold cavity the solidified third plastic material provides one or more stabilizing regions that rigidly secure the second common mold part in position in relation to the second complementary mold part in order to impede movement of the second common mold part in relation to the second complementary mold part during the injection of the fourth plastic material into the fourth mold cavity, to thereby produce a second thin-walled plastic product having controlled dimensions.

The method of the present invention may also be used for molding a product having a side wall including an approximately longitudinal strip that may be transparent to provide a transparent window in the side wall. This feature is particularly advantageous when it is 15 desired to provide a longitudinal window in the side wall in order to monitor the level of a substance, such as a fluid, contained in the plastic product. In one embodiment, the first plastic material component is shaped to provide at least one stabilizing region that is transverse 20 to a parting line between the first common mold part and the first complementary mold part, whereby the longitudinal strip is defined by the transverse stabilizing region. A transparent window is provided in the side wall by injecting a transparent first plastic material into 25 the first mold cavity. A nontransparent second plastic material is injected into the second mold cavity to provide a nontransparent background for printing in the remainder of the side wall. In an alternative embodiment, the first plastic material component is shaped 30 such that when the first plastic material component is contained in the second mold cavity, the second mold cavity defines at least one unfilled cavity region that is transverse to a parting line between the first common mold part and the second complementary mold part, 35 whereby the longitudinal strip is defined by the unfilled transverse cavity region. In this embodiment, a transparent window is provided in the side wall by injecting a transparent second plastic material into the second mold cavity; and a nontransparent first plastic material 40 is injected into the first mold cavity to provide a nontransparent background for printing in the remainder of the side wall.

In another aspect of the method of the present invention, the step of shaping the first plastic material component (step (g)) may further include the step of providing a first complementary mold part that is dimensioned in relation to the first common mold part such that when combined with the first common mold part to assemble the first mold cavity, portions of the first complementary mold part contact portions of the first common mold part to rigidly secure the first common mold part in position in relation to the first complementary mold part in order to impede movement of the first common mold part in relation to the first complementary mold part during the injection of the first plastic material into the first mold cavity.

The present invention further provides apparatus for performing the method of the present invention and hollow, thin-walled plastic products molded according 60 to the method of the present invention.

Additional features of the present invention are described in relation to the description of the preferred embodiments.

## BRIEF DESCRIPTION OF THE DRAWING

FIGS. 1A and 1B are sectional views illustrating a first mold cavity assembled by combining a first com-

mon mold part with a first complementary mold part. FIG. 1A is a top sectional view taken along lines A—A in FIG. 1B; and FIG. 1B is a side sectional view taken along lines B—B in FIG. 1A. FIGS. 1A and 1B further show the first plastic material injected into the first mold cavity.

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FIGS. 2A and 2B are sectional views illustrating a second mold cavity assembled by combining the first common mold part of FIGS. 1A and 1B with a second complementary mold part. FIG. 2A is a top sectional view taken along lines A—A in FIG. 2B; as de sectional view taken along lines B—B in FIG. 2A. FIGS. 2A and 2B further show the first plastic material component contained in the second mold cavity and the second plastic material injected into the second mold cavity.

FIGS. 3A through 3D illustrate a series of steps in the performance of a preferred embodiment of the method of the present invention.

FIG. 4 illustrates a first plastic material component formed in an alternative embodiment of the method of the present invention.

FIG. 5 is a sectional view illustrating a second mold cavity containing the first plastic material component of FIG. 4. FIG. 5 also is a sectional view illustrating a product molded according to such alternative embodiment of the method of the present invention.

FIG. 6 illustrates a first plastic material component formed in a further alternative embodiment of the method of the present invention.

FIG. 7 is a sectional view illustrating a second mold cavity containing the first plastic material component of FIG. 6. FIG. 7 also provides a sectional view of a product molded according to such further alternative embodiment of the method of the present invention.

# DESCRIPTION OF THE PREFERRED EMBODIMENTS

Referring to FIGS. 1A and 1B the apparatus of a preferred embodiment of the present invention includes a first common mold part 10 and first complementary mold part 12. The first common mold part 10 is combined with the first complementary mold part 12 to assemble a first mold cavity 14. The first complementary mold part 12 is dimensioned in relation to the first common mold part 10 such that when so combined with the first common mold part 10 to assemble the first mold cavity 14, portions 16 of the first complementary mold part 12 contact portions 18 of the first common mold part 10 to rigidly secure the first common mold part 10 in position in relation to the first complementary mold part 12 in order to impede movement of the first common mold part 10 in relation to the first complementary mold part 12 during injection of the first plastic material 20 into the first mold cavity 14. The first plastic material 20 is injected into the mold cavity 14 through a gate 22 and a runner 24 in the first complementary mold part

The injected first plastic material 20 is solidified to form a first plastic material component 20 by cooling the injected first plastic material in the first mold cavity 14, whereby the first plastic material component 20 is shaped in accordance with the dimensions of the first mold cavity 14. In an alternative embodiment, the first plastic material component may be further shaped following removal of the first complementary mold part 12.

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Referring to FIGS. 2A and 2B the apparatus of a preferred embodiment of the present invention includes a second complementary mold part 26. The first common mold part 10 is combined with the second complementary mold part 26 to assemble a second mold cavity 5 28 with the first plastic material component 29 attached to the first common mold part 10, so that when the second mold cavity 28 is assembled, the first plastic material component 20 is contained within the second mold cavity 28.

The first plastic material component 20 is shaped such that when the first plastic material component 20 is so contained in the second mold cavity 28 the first plastic material component 20 provides one or more stabilizing regions 30 that rigidly secure the first common mold I part 10 in position in relation to the second complementary mold part 26 in order to impede movement of the first common mold part 10 in relation to the second complementary mold part 26 during the insertion of a second plastic material 32 into the second mold cavity 20

The second plastic material 32 is injected into the second mold cavity 28 through a gate 34 and a runner 36 in the second complementary mold part 26 while the second mold cavity 28.

The injected second plastic material 32 is solidified by cooling in the second mold cavity 28 so as to form a second plastic material component 32 that fises with the first plastic material component 20 to produce thin- 30 the second complementary mold part 26. walled hollow plastic product 38 having controlled

A preferred embodiment of a method of cyclic injection molding of hollow, thin-walled plastic products according to the present invention, utilizing two com- 35 mon mold parts and two complementary mold parts to provide four mold cavities is described with reference to FIGS. 3A through 3D.

Referring to FIG. 3A, a second common mold part 12 to assemble a third mold cavity 42; while at the same time the first common mold part 10 is combined with the second complementary mold part 26 to assemble a second mold cavity 28, with the first plastic material component 18 attached to the first common mold part 45 10, so that when the second mold cavity 28 is assembled, the first plastic material component 20 is contained within the second mold cavity 28. The formation of the first plastic material component 20 is discussed above in relation to FIGS. 1A and 1B.

A third plastic material 44, which may be the same as the first plastic material 20, is injected into the third mold cavity 42 through the gate 22 and the runner system 24 contained in the first complementary mold part 12; while at the same time, the second plastic mate- 55 rial 32 is injected into the second mold cavity 28 through the gate 34 and a runner system 36 contained in the second complementary mold part 26.

The injected third plastic material 44 is solidified by cooling in the third mold cavity 42 to form a third plas- 60 tic material component 44; while at the same time the injected second plastic material 32 is solidified by cooling in the second mold cavity 28 so as to form the second plastic material component 28 that fuses with the first plastic material component 20 to produce the hol- 65 low, thin-walled plastic product 38.

Referring to FIG. 3B, the first common mold part 10 and the second common mold part 40 are separated

from the second complementary mold part 26 and the first complementary mold part 12 respectively; and the molded hollow, thin-walled plastic product 38 is ejected from first common mold part 10, while the third plastic material component 44 is retained on the third common mold part 40. The positions of the first common mold part 10 and the second common mold part 40 are then interchanged from those shown in FIG. 3B to those shown in FIG. 3C.

Referring to FIG. 3C, the first common mold part 10 is combined with the first complementary mold part 12 to assemble the first mold cavity 14; while at the same time the second common mold part 40 is combined with the second complementary mold part 26 to assemble a fourth mold cavity 48, with the first plastic material component 44 attached to the third common mold part 40, so that when the fourth mold cavity 48 is assembled, the third plastic material component 44 is contained within the fourth mold cavity 48. The formation of the third plastic material component 44 is discussed above in relation to FIG. 3A.

The first plastic material 20, which may be the same as the third plastic material 44, is injected into the first mold cavity 14 through the gate 22 and the runner first plastic material component 20 is contained in the 25 system 24 contained in the first complementary mold part 12; while at the same time, a fourth plastic material 50, which may be identical to the second plastic material 32, is injected into the fourth mold cavity 48 through the gate 34 and a runner system 36 contained in

> The injected first plastic material 20 is solidified by cooling in the first mold cavity 14 to form another first plastic material component 20; while at the same time the injected fourth plastic material 50 is solidified by cooling in the fourth mold cavity 48 so as to form the second plastic material component 48 that fuses with the third plastic material component 44 to produce a second hollow, thin-walled plastic product 52.

Referring to FIG. 3D, the first common mold part 10 40 is combined with the first complementary mold part 40 and the second common mold part 40 are separated from the first complementary mold part 12 and the second complementary mold part 26 respectively; and the second molded hollow, thin-walled plastic product 52 is ejected from second common mold part 40, while the first plastic material component 20 is retained on the first common mold part 10. The positions of the first common mold part 10 and the second common mold part 40 are then interchanged from those shown in FIG. 3D to those shown in FIG. 3A, and the cycle is re-

> As described above, the first plastic material component 20 is shaped such that when the first plastic material component 20 is contained in the second mold cavity 28, the first plastic material component 20 provides one or more stabilizing regions 30 that rigidly secure the first common mold part 20 in position in relation to the second complementary mold part 26 in order to impede movement of the first common mold part 10 in relation to the second complementary mold part 26 during injection of the second plastic material 32 into the second mold cavity 28.

> Likewise, the third plastic material component 44 is shaped such that when the third plastic material compopent 44 is contained in the fourth mold cavity 48, the third plastic material component 44 provides one or more stabilizing regions that rigidly secure the second common mold part 40 in position in relation to the second complementary mold part 26 in order to impede

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movement of the second common mold part 40 in relation to the second complementary mold part 26 during injection of the fourth plastic material 50 into the fourth mold cavity 48.

The method described above with reference to FIGS. 5 3A through 3D may be used for producing hollow, thin-walled plastic products having laminated walls of different plastic materials. In performing such method, the first plastic material 20 is injected until it reaches a parting line 54 between the first common mold part 10 10 and the first complementary mold part 12 (FIG. 3C); and the second plastic material 32 is injected until it reaches a parting line 56 between the first common mold part 10 and the second complementary mold part 26 (FIG. 3A). Likewise, the third plastic material 44 is 15 injected until it reaches a parting line 58 between the second common mold part 40 and the first complementary mold part (FIG. 3A); and the fourth plastic material 50 is injected until it reaches a parting line 60 between the second common mold part 40 and the second 20 complementary mold part 26.

Referring to FIGS. 4 and 5, the method of the present invention also may be used for molding a product 62 having a side wall 64 including at least one approximately longitudinal strip that may be transparent to 25 thereby provide a transparent window in the side wall 64.

In one embodiment, the first plastic material component 66 is shaped to provide at least one stabilizing region 68 that is transverse to a parting line 54 (FIG. 30 3C) between the first common mold part 10 and the first complementary mold part 12, whereby each longitudinal strip is defined by a transverse stabilizing region 68. The stabilizing regions 68 need not extend all the way to the parting line 54. A transparent window is provided in 35 the side wall 64 by injecting a transparent first plastic material into the first mold cavity to provide the first plastic material component 66. A nontransparent second plastic material 72 is injected into the second mold cavity 74 to provide a nontransparent background for 40 printing in the remainder of the side wall 64.

In an alternative embodiment, the first plastic material component 66 is shaped such that when the first plastic material component 66 is contained in the second mold cavity 74, the second mold cavity 74 defines at 45 least one unfilled cavity region 72 that is transverse to a parting line 56 (FIG. 3A) between the first common mold part 10 and the second complementary mold part 26, whereby longitudinal strips may be provided in the unfilled transverse cavity regions 72. The unfilled trans- 50 verse cavity regions 72 need not extend all the way to the parting line 56. In this embodiment, transparent windows are defined in the side wall 64 by injecting a transparent second plastic material into the second mold cavity 74 to fill the transverse cavity regions 72. Prior 55 thereto, a nontransparent first plastic material is injected into the first mold cavity to form the first plastic material component 66 and thereby provide a nontransparent background for printing in the remainder of the side wall 64.

Referring to FIGS. 6 and 7, in a further preferred embodiment, the first plastic material component 82 that is shaped as shown in FIG. 6 to include a plurality of symmetrically disposed stabilizing regions 84, which extend approximately longitudinally over a portion of 65 the side wall 86 of the molded product 88. The first plastic material component 82 is molded in a first mold cavity in accordance with the teaching of applicant's

U.S. Pat. application No. 7,463, filed Jan. 26, 1987 and in accordance of the above description to the extent that such description is compatible with the teaching of application Ser. No. 7,463. After the first plastic material component 82 is formed in a first mold cavity, which is assembled by combining a first complementary mold part 12 and a first common mold part 10, the first plastic component 82 is retained on the first common mold part 10 while the first common mold part 10 is combined with a second complementary mold part 26 to assemble a second mold cavity 90, as shown in FIG.

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Referring to FIG. 7, the first plastic material component 82 is shaped such that when the first plastic material component 82 is contained in the second mold cavity 90, the first plastic material component 82 provides one or more stabilizing regions 84 that rigidly secure the first common mold part 10 in position in relation to the second complementary mold part 26 in order to impede movement of the first common mold part 10 in relation to the second complementary mold part 26 during injection of the second plastic material 92 into the second mold cavity 90.

The injected second plastic material 92 is solidified by cooling in the second mold cavity 90 to form a second plastic material component 92 that fuses with the first plastic material component 82 to produce the hollow, thin-walled, plastic product 88. The side wall 86 of the molded product 88 thus includes two layers of plastic 82, 92. The molded product 88 has controlled dimensions, is generally shaped as shown in FIG. 6, and has a lateral cross section as shown in FIG. 7. The side wall 86 of the molded product thus includes two layers of plastic 82, 92.

The stabilizing regions 84 have a wall thickness equal to the thickness of the side wall 86 and are transverse to the parting line 56 (FIG. 3A) between the first common mold part 10 and the second complementary mold part 26 to thereby provide longitudinal transparent windows 84 in the side wall 86. The stabilizing regions 84 need not extend all the way to the parting line 56. In a preferred embodiment of this product, the other side-wall layer 90 is nontransparent and extends throughout the majority of the side wall 86.

The present invention may be modified from the embodiments illustrated and described above. The common mold parts may be cavity mold parts instead of core mold parts, as illustrated and described herein. In addition, injections of plastic material into any given mold cavity may be made through more than one gate. Also, injections of plastic materials may be made into more than two mold cavities simultaneously, whereby the number of mold cavities included in the mold may be a multiple of the number of separate mold cavities required to produce a single product. For example, when using the method described and illustrated herein for producing a product composed of two plastic material components formed following injection of plastic material into two separate mold cavities, the number of mold cavities included in the mold may be any multiple of two, i.e. 2, 4, 6, etc.

The present invention also can be used to mold products including more than two plastic material components formed following injection of plastic material into more than two separate mold cavities. In an embodiment requiring three separate mold cavities, a third complementary mold part is used, and the fused first and second plastic material components are retained on

the first common mold part when the first common mold part is combined with the third complementary mold part to assemble the third mold cavity, with the fused first and second mold parts being shaped to stabilize the common mold in relation to the third complementary mold part during injection of a third plastic material into the third mold cavity.

The core-stabilization techniques described in applicant's U.S. Pat. Nos. 4,381,275 and 4,508,676; U.S. Pat. No. 3,737,272 to Stegmuller; and in Australian Patent 10 Specification 17,577/70 filed by Ryles and published Jan. 20, 1972 may be used to stabilize the common mold part in relation to the first complementary mold part during the injection of the first plastic material in lieu of the technique described above with relation to FIGS. 15 1A and 1B.

The first and second plastic materials may be either the same material or different materials. It is sometimes advantageous to use first and second plastic materials having different physical characteristics. For example, 20 the present invention is ideally suited for molding a hollow, thin-walled plastic product in which the side wall must provide both a moisture barrier and a gas (such as Oxygen) barrier. To mold such a product, a plastic material having a desirable moisture-barrier 25 characteristic is selected as one of the injected plastic materials; and a plastic material having a desirable gas-barrier characteristic is selected as the other injected plastic material.

I claim:

1. A method of cyclic injection molding a thin-walled hollow, plastic product having a closed end and an open end with laminated walls terminating in a rim at the open end, utilizing a first mold cavity and a second mold cavity, the first mold cavity being defined by a 35 first common mold part and a first complementary mold part, and the second mold cavity being defined by the first common mold part and a second complementary mold part, the method comprising the steps of

(a) combining the first common mold part with the 40 first complementary mold part to assemble the first

mold cavity;

(b) injecting a first plastic material into the first mold cavity:

(c) solidifying the injected first plastic material to 45

form a first plastic material component;

(d) combining the first common mold part with the second complementary mold part to assemble the second mold cavity with the first plastic material component attached to the first common mold part 50 so that when the second mold cavity is assembled the first plastic material component is contained within the second mold cavity;

(e) injecting a second plastic material having different characteristics than the first plastic material into 55 the second mold cavity while the first plastic material component is contained therein; and

(f) solidifying the injected second plastic material so as to form a second plastic material component that fuses with the first plastic material component to 60 produce a hollow plastic product;

wherein step (c) comprises the step of

(g) shaping the first plastic material component such that when the first plastic material component is so contained in the second mold cavity the first plastic 65 material component provides one or more stabilizing regions that rigidly secure the first common mold part in position in relation to the second complementary mold part in order to impede movement of the first common mold part in relation to the second complementary mold part during step (e), to thereby produce a thin-walled plastic product having controlled dimensions;

wherein step (b) comprises the step of

 (h) injecting the first plastic material until it reaches the portion of the first mold cavity that defines the rim of the product; and

wherein step (e) comprises the step of

(i) injecting the second plastic material until it reaches the portion of the second mold cavity that defines the rim of the product.

2. A method according to claim 1 for molding a product having a side wall including an approximately longitudinal strip, wherein step (g) comprises shaping the first plastic material component to provide at least one said stabilizing region that is transverse to a parting line between the first common mold part and the first complementary mold part, whereby said longitudinal strip is defined by said transverse stabilizing region.

3. A method according to claim 2,

wherein step (b) comprises injecting a said first plastic material that is transparent, whereby said strip defines a transparent window in the side wall; and wherein step (e) comprises injecting a said second plastic material that is nontransparent.

4. A method according to claim 1 for molding a product having a side wall including an approximately longitudinal strip, wherein step (g) comprises shaping the first plastic material component such that when the first plastic material component is contained in the second mold cavity, the second mold cavity defines at least one unfilled cavity region that is transverse to a parting line between the first common mold part and the second complementary mold part, whereby said longitudinal strip is defined by said unfilled transverse cavity region.

5. A method according to claim 4,

wherein step (b) comprises injecting a said first plastic material that is nontransparent; and

wherein step (e) comprises injecting a said second plastic material that is transparent, whereby said strip defines a transparent window in the side wall.

- 6. A method according to claim 1, for cyclic injection molding a plurality of thin-walled, hollow, plastic products, further utilizing a third mold cavity and a fourth mold cavity, the third mold cavity being defined by a second common mold part and the first complementary mold part, and the fourth mold cavity being defined by the second common mold part and the second complementary mold part, the method further comprising the steps of:
  - (h) during step (d), combining the second common mold part with the first complementary mold part to assemble the third mold cavity;

 during step (e), injecting a third plastic material into the third mold cavity;

- (j) during step (f), solidifying the injected third plastic material to form a third plastic material component;
- (k) during step (a), combining the second common mold part with the second complementary mold part to assemble the fourth mold cavity with the third plastic material attached to the second common mold part so that when the fourth mold cavity is assembled the third plastic material is contained within the fourth mold cavity;

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(I) during step (b), injecting the fourth plastic material into the fourth mold cavity while the solidified third plastic material is contained therein; and

(m) during step (c), solidifying the injected fourth plastic material so as to form a fourth plastic mate- 5 rial component that fuses with the third plastic material to produce a second hollow plastic prod-

wherein step (j) comprises the step of

- that when the third plastic material component is so contained in the fourth mold cavity the third plastic material component provides one or more stabilizing regions that rigidly secure the second common mold part in position in relation to the second complementary mold part in order to impede movement of the second common mold part in relation to the second complementary mold part walled plastic product having controlled dimen-
- 7. A method according to claim 6, for producing said products having laminated walls,

wherein step (b) comprises the step of

(o) injecting the first plastic material until it reaches the parting line between the first common mold part and the first complementary moid part;

wherein step (e) comprises the step of

(p) injecting the second plastic material until it 30 reaches the parting line between the first common mold part and the second complementary mold part;

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wherein step (i) comprises the step of (q) injecting the third plastic material until it reaches the parting line between the second common mold part and the first complementary mold part; and wherein step (I) comprises the step of

(r) injecting the fourth plastic material until it reaches the parting line between the second common mold

- part and the second complementary mold part. 8. A method according to claim 6, wherein the first (n) shaping the third plastic material component such 10 plastic material is the same as the third plastic material and the second plastic material is the same as the fourth plastic material.
  - 9. A method according to claim 1, wherein step (g) further comprises providing a said first complementary 15 mold part that is dimensioned in relation to the first common mold part such that when so combined with the first common mold part to assemble the first mold cavity, portions of the first complementary mold part contact portions of the first common mold part to rigduring step (I), to thereby produce a second thin- 20 idly secure the first common mold part in position in relation to the first complementary mold part in order to impede movement of the first common mold part in relation to the first complementary mold part during step (b).

A method according to claim 1, further compris-

ing the step of

(j) between steps (c) and (d), separating said first common mold part with the first plastic material component attached thereto from said first complementary mold part without dividing that portion of said first complementary mold part that defines the rim of the product.

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