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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

_____)	
BELDEN INC.,)	
Plaintiff)	Civil Action No. _____
v.)	
LS CABLE AND SYSTEM LTD., and)	JURY TRIAL DEMANDED
LS CABLE AMERICA, INC.)	
Defendants.)	<i>Electronically Filed Document</i>
_____)	

COMPLAINT AND JURY DEMAND

Plaintiff Belden Inc. ("Plaintiff" or "Belden") for its Complaint against
Defendants LS Cable and System Ltd. (f/k/a "LS Cable Ltd.") and LS Cable America, Inc.

(collectively, “Defendants”), to the best of its knowledge, information and belief, hereby alleges as follows:

NATURE OF THE ACTION

1. This is an action for infringement of United States Patent No. 7,977,575. As alleged herein, Defendants – individually, jointly and/or with others – have infringed (literally and/or by equivalents), and continue to infringe, Belden’s patent rights by making, using, importing, selling, and/or offering to sell within the United States data communications cable products covered by one or more patent claims, and/or by contributing to or inducing such infringement.

2. For example, on information and belief, Defendants – individually, jointly, and/or with others – make, use, import, sell and/or offer to sell within the United States infringing Category 6 and above cables, including without limitation, for example, LS Cable “Category 6+ 6 UTP Cable 4 Pair” and “Category 6 UTP Cable 4 Pair” cables.

PARTIES

3. Plaintiff Belden is a Delaware corporation having a principal place of business at 7733 Forsyth Boulevard, Suite 800, St. Louis, Missouri 63105.

4. On information and belief, Defendant LS Cable and System Ltd. is a corporation organized under the laws of the Republic of Korea, having a principal place of business at the LS Tower, 1026-6 Hogye-dong, Dongan-gu, Anyang-si Gyeonggi-do, Republic of Korea 431-080.

5. On information and belief, Defendant LS Cable America, Inc. is a New Jersey corporation, having a principal place of business at 920 Sylvan Avenue, Englewood Cliffs, New Jersey 07632.

6. On information and belief, LS Cable America, Inc. is a wholly owned subsidiary of LS Cable and System Ltd.

JURISDICTION AND VENUE

7. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§1331 and 1338(a).

8. This Court has personal jurisdiction over LS Cable America, Inc., which is a New Jersey corporation with its principal place of business in New Jersey.

9. On information and belief, Defendants, independently, jointly, and/or at the direction of one another, manufacture, and export, sell, and/or offer to sell the data communications cables that are the subject of this action to customers in the United States, including customers in New Jersey, such as at least LS Cable America, Inc.

10. LS Cable and System Ltd. and LS Cable America, Inc. are parties in the action *Belden Inc. v. LS Cable Ltd. and LS Cable America, Inc.*, Civil Action No. 10-cv-05476-ES-MAS (D.N.J.) now pending in the District of New Jersey.

11. LS Cable and System Ltd. has previously accepted service of pleadings in the action *Belden Tech., Inc. v. LS Corp. et al.*, Civil Action No. 08-cv-00823-SLR (D. Del.), through Jong Won Kim, 920 Sylvan Avenue, Englewood Cliffs, NJ 07632.

12. On information and belief, a former incarnation of LS Corp. and/or LS Cable and System Ltd. has registered to do business in New Jersey and appointed Jong Won Kim, 920 Sylvan Avenue, Englewood Cliffs, NJ 07632 as its registered agent. On information and belief, Jong Won Kim was the President of LS Cable America, Inc.

13. On information and belief, LS America, Inc. is controlled and/or dominated by LS

Cable and System Ltd., serving as an agent and/or alter ego thereto.

14. Accordingly, personal jurisdiction over LS Cable and System Ltd. is proper in New Jersey.

15. Venue is proper in the District of New Jersey under 28 U.S.C. §§1391 and 1400(b).

COUNT I
Infringement of U.S. Patent No. 7,977,575

16. Belden is the owner of United States Patent No. 7,977,575 (“the ’575 patent”) entitled “High Performance Data Cable,” and has the right to sue on the ’575 patent. A copy of the ’575 patent is attached as Exhibit A.

17. Defendant LS Cable and System Ltd. has infringed (literally and/or by equivalents), and is continuing to infringe, the ’575 patent by making, using, importing, selling, and/or offering to sell data communications cable products covered by one or more of the ’575 patent claims within the United States, and/or by contributing to or inducing such infringement.

18. Defendant LS Cable and System Ltd.’s infringement of the ’575 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

19. Defendant LS Cable America, Inc. has infringed (literally and/or by equivalents), and is continuing to infringe, the ’575 patent by making, using, importing, selling, and/or offering to sell data communications cable products covered by one or more of the ’575 patent claims within the United States, and/or by contributing to or inducing such infringement.

20. Defendant LS Cable America, Inc.’s infringement of the ’575 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has

caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Belden requests that this Court enter judgment as follows ordering that:

(a) Defendants infringe the '575 patent by their making, using, offering for sale, selling and/or offering to sell data communications cable products covered by one or more of the '575 patent claims within the United States, and/or by contributing to or inducing such infringement;

(b) Defendants' infringement of the '575 patent is willful;

(c) Defendants and their affiliates, subsidiaries, officers, directors, employees, agents, representatives, licensees, successors, assigns, and all those acting for any of them or on their behalf, or acting in concert with them, be preliminarily and permanently enjoined from further infringement of Belden's patent rights;

(d) Plaintiff be awarded compensatory damages and costs, with prejudgment and post-judgment interest;

(e) Plaintiff be awarded treble damages for willful patent infringement;

(f) This case be declared to be exceptional in favor of Plaintiff under 35 U.S.C. § 285, and that Plaintiff be awarded its costs, attorneys' fees, and other expenses incurred in connection with this action; and

(g) Plaintiff be awarded such other relief as the Court deems just and proper.

JURY DEMAND

Belden demands a trial by jury on all issues so triable.

LOCAL CIVIL RULE 11.2 CERTIFICATION

The matter in controversy is not the subject of any other action pending in any other court or any pending arbitration or administrative proceeding.

Respectfully submitted,

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