

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

JOHN MEZZALINGUA ASSOCIATES, INC.,  
D/B/A PPC

Plaintiff,

v.

INTEGRATED NETWORK CABLE, INC. D/B/A  
SHOWMECABLES, MENAGE AUTOMATION, INC.  
D/B/A HOMETECH SOLUTIONS, SMARTLABS, INC.  
D/B/A SMARTHOME, INC., WIRED COMMUNICATIONS,  
INC., MONOPRICE, INC., ARIZA TECHNOLOGY, INC.,  
ZHEJIANG CIXI WINSHOW EQUIPMENT CO., LTD.,  
HANGZHOU PREVAIL OPTOELECTRONIC EQUIPMENT  
CO., LTD., HANJIANG FEIYU ELECTRONICS  
EQUIPMENT FACTORY, STEREN ELECTRONICS  
INTERNATIONAL, LLC, ZHEJIANG TIANJIE  
INDUSTRIAL COMPANY, LTD., STRUCTURED CABLE  
PRODUCTS, INC., INTERMARK INDUSTRIES, INC.,  
EDALI INDUSTRIAL CORPORATION, AND PICO  
DIGITAL, INC.,

Defendants.

Civil Action No. 5:10-cv-1162  
(NAM/DEP)

**JURY TRIAL DEMANDED**

**AMENDED COMPLAINT**

Plaintiff John Mezzalingua Associates, Inc., which conducts business in the telecommunications industry as PPC (“PPC”), through its undersigned attorneys, hereby states its Amended Complaint against Defendants Integrated Network Cable, Inc., which conducts business as ShowMeCables (“ShowMeCables”), Menage Automation, Inc., which conducts business as HomeTech Solutions (“HomeTech”), SmartLabs, Inc., which conducts business as Smarthome, Inc. (“Smarthome”), Wired Communications, Inc. (“Wired”), Monoprice, Inc. (“Monoprice”), Ariza Technology, Inc. (“Ariza”), Zhejiang Cixi Winshow Equipment Co., Ltd.

(“Cixi”), Hangzhou Prevail Optoelectronic Equipment Co., Ltd. (“Hangzhou”), Hanjiang Feiyu Electronics Equipment Factory, also known as Zhongguang Electronics, and also known as Yangzhou Zhongguang Electronics, and also known as Yangzhou Zhongguang Foreign Trade Co. (“Feiyu”), Steren Electronics International, LLC (“Steren”), Zhejiang Tianjie Industrial Company, Ltd. (“Tianjie”), Structured Cable Products, Inc. (“Structured”), Intermark Industries, Inc. (“Intermark”), Edali Industrial Corporation (“Edali”), and Pico Digital, Inc. (“Pico”) (collectively “Defendants”) as follows:

### **NATURE OF THIS ACTION**

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

### **PARTIES**

2. Plaintiff John Mezzalingua Associates, Inc., which does business under the name PPC, is a Delaware corporation with its principal place of business at 6176 E. Molloy Road, East Syracuse, New York 13057.

3. Upon information and belief, Defendant Integrated Network Cables, Inc., which does business under the name ShowMeCables, is a foreign corporation organized and existing under the laws of the State of Missouri with its principal place of business at 18079 Edison Avenue, Chesterfield, MO 63005.

4. Upon information and belief, Defendant Menage Automation, Inc., which does business under the name HomeTech Solutions, is a foreign corporation organized and existing under the laws of the State of California with its principal place of business at 10600 S. De Anza Boulevard, Cupertino, CA 95014.

5. Upon information and belief, Defendant SmartLabs, Inc., which does business as Smarthome, Inc., is a foreign corporation organized and existing under the laws of the State of California with its principal place of business at 16542 Millikan Avenue, Irvine, CA 92606.

6. Upon information and belief, Defendant Wired Communications, Inc. is a foreign corporation organized and existing under the laws of the State of California with its principal place of business at 7342 E. Quail Track Road, Scottsdale, AZ 85266.

7. Upon information and belief, Defendant Monoprice, Inc. is a foreign corporation organized and existing under the laws of the State of California with its principal place of business at 11701 6<sup>th</sup> Street, Rancho Cucamonga, CA 91730.

8. Upon information and belief, Defendant Ariza Technology, Inc. is a foreign corporation organized and existing under the laws of Canada with its principal place of business at 45 Esandar Drive, Unit 3, Toronto, Ontario M4G 4C5, Canada.

9. Upon information and belief, Defendant Zhejiang Cixi Winshow Equipment Co., Ltd. is a foreign company organized and existing under the laws of China with its principal place of business at Xinpu Industrial Area, Cixi City, Zhejiang Province, China.

10. Upon information and belief, Defendant Hangzhou Prevail Optoelectronic Equipment Co., Ltd. is a foreign company organized and existing under the laws of China with its principal place of business at Guali Industrial Development Zone, Xiaoshan, Hangzhou City, Zhejiang Province, China.

11. Upon information and belief, Defendant Hanjiang Feiyu Electronics Equipment Factory, also known as Zhongguang Electronics, and also known as Yangzhou Zhongguang Electronics, and also known as Yangzhou Zhongguang Foreign Trade Co, is a foreign company organized and existing under the laws of China with its principal place of business at No. 1 East

Hong Xing Road, Hongqiao Street, Touqiao Town, Hanjiang District, Yangzhou, Jiangsu Province, P.C. 225108, China.

12. Upon information and belief, Defendant Steren Electronics International, LLC is a foreign limited liability company organized and existing under the laws of the State of California with its principal place of business at 6260 Sequence Drive, San Diego, CA 92121.

13. Upon information and belief, Defendant Zhejiang Tianjie Industrial Company, Ltd. is a foreign company organized and existing under the laws of China with its principal place of business at Linglong Economic Development Zone, Lin'an Hangzhou, P.C. 311301, China.

14. Upon information and belief, Defendant Structured Cable Products, Inc. is a foreign corporation organized and existing under the laws of the State of Florida with its principal place of business at 6228 Hiatus Road, Fort Lauderdale, FL 33321.

15. Upon information and belief, Defendant Intermark Industries, Inc. is a foreign corporation organized and existing under the laws of the State of Florida with its principal place of business at 2980 NW 74<sup>th</sup> Ave., Miami, FL 33122.

16. Upon information and belief, Defendant Edali Industrial Corporation is a company organized and existing under the laws of Taiwan with its principal place of business at No. 20-7, Siagueirou Shan, Danshuei Township, Taipei County, 251-52, Taiwan.

17. Upon information and belief, Defendant Pico Digital, Inc., formerly known as Pico Macom, Inc., is a foreign corporation organized and existing under the laws of the State of Delaware with its principal place of business at 6260 Sequence Drive, San Diego, CA 92121.

### **JURISDICTION AND VENUE**

18. This Court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338(a), and 35 U.S.C. § 281.

19. This Court has personal jurisdiction over Defendants because they manufacture, import, sell and/or offer to sell in the United States and in the Northern District of New York, either directly or through intermediaries and/or established distribution channels, coaxial cable compression connectors that infringe at least one PPC patent, including but not limited to U.S. Patent Nos. 5,470,257; 6,558,194; 6,848,940 and D519,076, and thus: (1) transacted business within the state or contracted anywhere to supply infringing goods in this State and this District; (2) committed tortious acts of infringement within this State and in this District; and/or (3) committed tortious acts of infringement without this State that cause injury within this State and this District either (i) while regularly doing business, engaging in a persistent course of conduct, or deriving substantial revenue from infringing goods sold to consumers in this State and in this District, and/or (ii) while deriving substantial revenue from interstate or international commerce while expecting that their infringing acts would have consequences within this State and this District.

20. Venue is proper in this District under 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b) because each of the Defendants is subject to personal jurisdiction in this District.

### **THE PPC PATENTS-IN-SUIT**

21. On November 28, 1995, the U.S. Patent and Trademark Office (“USPTO”) issued U.S. Patent No. 5,470,257 (“the ’257 Patent”), entitled “Radial Compression Type Coaxial Cable End Connector,” to PPC. A true and correct copy of the ’257 Patent is attached as Exhibit A.

22. On May 6, 2003, the USPTO issued U.S. Patent No. 6,558,194 (“the ’194 Patent”), entitled “Connector and Method of Operation,” to PPC. A true and correct copy of the ’194 Patent is attached as Exhibit B.

23. On February 1, 2005, the USPTO issued U.S. Patent No. 6,848,940 (“the ’940 Patent”), entitled “Connector and Method of Operation,” to PPC. A true and correct copy of the ’940 Patent is attached as Exhibit C.

24. On April 18, 2006, the USPTO issued U.S. Design Patent No. D519,076 (“the ’076 Patent”), entitled “Coax Cable Connector,” to PPC. A true and correct copy of the ’076 Patent is attached as Exhibit D. (Collectively, the ’257 Patent, ’194 Patent, ’940 Patent and the ’076 Patent are hereinafter referred to as “the PPC Patents.”)

25. PPC is the lawful owner of all rights, titles, and interests in the PPC Patents, including the right to sue for patent infringement.

26. PPC has placed the required statutory notice under 35 U.S.C. § 287 on all or substantially all products manufactured and sold by or for PPC under the PPC Patents after issuance thereof.

### **COUNT 1**

#### **(PATENT INFRINGEMENT OF U.S. PATENT NO. 5,470,257)**

27. PPC repeats and realleges the allegations contained in Paragraphs 1 through 25 above as if fully set forth herein.

28. Upon information and belief, Monoprice has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the ’257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

29. Upon information and belief, one or more Monoprice products, including its model 2973, 2976 and 2978 coaxial cable compression connectors, infringe the ’257 Patent.

30. Upon information and belief, Ariza has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

31. Upon information and belief, one or more Ariza products, including its model FY039-B coaxial cable compression connector, infringe the '257 Patent.

32. Upon information and belief, Cixi has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

33. Upon information and belief, one or more Cixi products, including its model FT018 and FT019 coaxial cable compression connectors, infringe the '257 Patent.

34. Upon information and belief, Hangzhou has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

35. Upon information and belief, one or more Hangzhou products, including its model WL/ZG048, WL/ZG050, WL/ZG053, WL/ZG060, WL/ZG062, WL/ZG065 and WL/ZG070 coaxial cable compression connectors, infringe the '257 Patent.

36. Upon information and belief, Feiyu has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

37. Upon information and belief, one or more Feiyu products, including its model FY039, FY039-B and FY040B coaxial cable compression connectors, infringe the '257 Patent.

38. Upon information and belief, Steren has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

39. Upon information and belief, one or more Steren products, including its model 200-016 coaxial cable compression connector, infringe the '257 Patent.

40. Upon information and belief, Tianjie has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC. (Collectively, Monoprice, Cixi, Hangzhou, Feiyu, Steren, Tianjie, and Pico are hereinafter referred to as "the '257 Defendants.")

41. Upon information and belief, one or more Tianjie products, including its model FY039 coaxial cable compression connectors, infringe the '257 Patent.

42. Upon information and belief, Pico has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '257 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

43. Upon information and belief, one or more Pico products, including its PermaSeal series coaxial cable compression connectors, infringe the '257 Patent.

44. Each of the '257 Defendants' infringement of the '257 Patent was deliberate and willful.

45. PPC has been damaged by each of the '257 Defendants' infringement of the '257 Patent.

## **COUNT 2**

### **(PATENT INFRINGEMENT OF U.S. PATENT NO. 6,558,194)**

46. PPC repeats and realleges the allegations contained in Paragraphs 1 through 43 above as if fully set forth herein.

47. Upon information and belief, ShowMeCables has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

48. Upon information and belief, one or more ShowMeCables products, including its model INC-9900B coaxial cable compression connector, infringe the '194 Patent.

49. Upon information and belief, HomeTech has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

50. Upon information and belief, one or more HomeTech products, including its model VA-120121X coaxial cable compression connector, infringe the '194 Patent.

51. Upon information and belief, Smarthome has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

52. Upon information and belief, one or more Smarthome products, including its model 849306 coaxial cable compression connector, infringe the '194 Patent.

53. Upon information and belief, Wired has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

54. Upon information and belief, one or more Wired products, including its model PermaSeal II coaxial cable compression connector, infringe the '194 Patent.

55. Upon information and belief, Cixi has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent,

within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

56. Upon information and belief, one or more Cixi products, including its model FT020 coaxial cable compression connector, infringe the '194 Patent.

57. Upon information and belief, Hangzhou has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

58. Upon information and belief, one or more Hangzhou products, including its model WL/ZG052, WL/ZG055, WL/ZG057, WL/ZG058 and WL/ZG071 coaxial cable compression connectors, infringe the '194 Patent.

59. Upon information and belief, Feiyu has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

60. Upon information and belief, one or more Feiyu products, including its model FY037, FY039A, FY041 and FY043 coaxial cable compression connectors, infringe the '194 Patent.

61. Upon information and belief, Steren has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent,

within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

62. Upon information and belief, one or more Steren products, including its model 200-004 and 200-006 coaxial cable compression connectors, infringe the '194 Patent.

63. Upon information and belief, Tianjie has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

64. Upon information and belief, one or more Tianjie products, including its model FY037 coaxial cable compression connector, infringe the '194 Patent.

65. Upon information and belief, Structured has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

66. Upon information and belief, one or more Structured products, including its model 908 and 909 coaxial cable compression connectors, infringe the '194 Patent.

67. Upon information and belief, Intermark has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or

selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

68. Upon information and belief, one or more Intermark products, including its model ISVP-F56COM coaxial cable compression connector, infringe the '194 Patent.

69. Upon information and belief, Edali has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC. (Collectively, ShowMeCables, HomeTech, Smarhome, Wired, Cixi, Hangzhou, Feiyu, Steren, Tianjie, Structured, Intermark, Edali, and Pico are hereinafter referred to as "the '194 and '940 Defendants.")

70. Upon information and belief, one or more Edali products, including its model FPL-56 and FC series coaxial cable compression connectors, infringe the '194 Patent.

71. Upon information and belief, Pico has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '194 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

72. Upon information and belief, one or more Pico products, including its PermaSeal II series coaxial cable compression connectors, such as its model F56-001, F56Q-001, and F59-001 connectors, infringe the '194 Patent.

73. Each of the '194 and '940 Defendants' infringement of the '194 Patent was deliberate and willful.

74. PPC has been damaged by each of the '194 and '940 Defendants' infringement of the '194 Patent.

**COUNT 3**

**(PATENT INFRINGEMENT OF U.S. PATENT NO. 6,848,940)**

75. PPC repeats and realleges the allegations contained in Paragraphs 1 through 71 above as if fully set forth herein.

76. Upon information and belief, ShowMeCables has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

77. Upon information and belief, one or more ShowMeCables products, including its model INC-9900B coaxial cable compression connector, infringe the '940 Patent.

78. Upon information and belief, HomeTech has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

79. Upon information and belief, one or more HomeTech products, including its model VA-120121X coaxial cable compression connector, infringe the '940 Patent.

80. Upon information and belief, Smarthome has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or

selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

81. Upon information and belief, one or more Smarthome products, including its model 849306 coaxial cable compression connector, infringe the '940 Patent.

82. Upon information and belief, Wired has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

83. Upon information and belief, one or more Wired products, including its model PermaSeal II coaxial cable compression connector, infringe the '940 Patent.

84. Upon information and belief, Cixi has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

85. Upon information and belief, one or more Cixi products, including its model FT020 coaxial cable compression connector, infringe the '940 Patent.

86. Upon information and belief, Hangzhou has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

87. Upon information and belief, one or more Hangzhou products, including its model WL/ZG052, WL/ZG055, WL/ZG057, WL/ZG058 and WL/ZG071 coaxial cable compression connectors, infringe the '940 Patent.

88. Upon information and belief, Feiyu has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

89. Upon information and belief, one or more Feiyu products, including its model FY037, FY039A, FY041 and FY043 coaxial cable compression connectors, infringe the '940 Patent.

90. Upon information and belief, Steren has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

91. Upon information and belief, one or more Steren products, including its model 200-004 and 200-006 coaxial cable compression connectors, infringe the '940 Patent.

92. Upon information and belief, Tianjie has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

93. Upon information and belief, one or more Tianjie products, including its model FY037 coaxial cable compression connector, infringe the '940 Patent.

94. Upon information and belief, Intermark has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

95. Upon information and belief, one or more Intermark products, including its model ISVP-F56COM coaxial cable compression connector, infringe the '940 Patent.

96. Upon information and belief, Structured has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

97. Upon information and belief, one or more Structured products, including its model 908 and 909 coaxial cable compression connectors, infringe the '940 Patent.

98. Upon information and belief, Edali has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

99. Upon information and belief, one or more Edali products, including its model FPL-56 and FC series coaxial cable compression connectors, infringe the '940 Patent.

100. Upon information and belief, Pico has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '940 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

101. Upon information and belief, one or more Pico products, including its model F56-001, F56Q-001, and F59-001 coaxial cable compression connectors, infringe the '940 Patent.

102. Each of the '194 and '940 Defendants' infringement of the '940 Patent was deliberate and willful.

103. PPC has been damaged by each of the '194 and '940 Defendants' infringement of the '940 Patent.

#### **COUNT 4**

##### **(PATENT INFRINGEMENT OF U.S. PATENT NO. D519,076)**

104. PPC repeats and realleges the allegations contained in Paragraphs 1 through 100 above as if fully set forth herein.

105. Upon information and belief, Ariza has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '076 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

106. Upon information and belief, one or more Ariza products, including its model FY039-B coaxial cable compression connector, infringe the '076 Patent.

107. Upon information and belief, Hangzhou has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '076 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC.

108. Upon information and belief, one or more Hangzhou products, including its model WL/ZG050 coaxial cable compression connector, infringe the '076 Patent.

109. Upon information and belief, Feiyu has been and is now directly infringing, contributorily infringing, and/or inducing infringement of at least one claim of the '076 Patent, within the meaning of 35 U.S.C. § 271(a)-(c), by making, using, importing, offering for sale, or selling coaxial cable compression connectors, either directly or through established distribution channels, without authority or license from PPC. (Collectively, Ariza, Hangzhou and Feiyu are hereinafter referred to as "the '076 Defendants.")

110. Upon information and belief, one or more Feiyu products, including its model FY039-B coaxial cable compression connector, infringe the '076 Patent.

111. Each of the '076 Defendants' infringement of the '076 Patent was deliberate and willful.

112. PPC has been damaged by each of the '076 Defendants' infringement of the '076 Patent.

#### **PRAYER FOR RELIEF**

WHEREFORE, PPC respectfully requests that this Court enter judgment against each of the Defendants, granting PPC the following relief:

- A. a declaration and entry of judgment that each of the '257 Defendants has infringed the '257 Patent;
- B. a declaration and entry of judgment that each of the '194 and '940 Defendants has infringed the '194 Patent;
- C. a declaration and entry of judgment that each of the '194 and '940 Defendants has infringed the '940 Patent;
- D. a declaration and entry of judgment that each of the '076 Defendants has infringed the '076 Patent;
- E. an accounting of all damages resulting from each of the Defendants' infringement of the PPC Patents;
- F. an award of damages adequate to compensate PPC for each of the Defendants' infringement of the PPC Patents;
- G. a determination that each of the Defendants' infringement of the PPC Patents has been willful and deliberate;
- H. an award of treble damages for each of the Defendants' willful and deliberate infringement of the PPC Patents;
- I. an award of interest on the amount of damages found, including pre-judgment and post-judgment interest;
- J. an injunction against future infringement by each of the Defendants, their officers, agents, servants, employees, and all those in concert or participation with each of the Defendants who receive actual notice, from engaging in acts of infringement of the PPC Patents, in accordance with 35 U.S.C. § 283;

- K. a determination that this is an exceptional case pursuant to 35 U.S.C. § 285, thereby entitling PPC to an award of its costs, expenses, and attorneys' fees incurred prosecuting this action; and
- L. such other and further relief as the Court deems just and proper.

**DEMAND FOR JURY TRIAL**

PPC demands a trial by jury of all issues so triable.

Date: July 20, 2011

**HISCOCK & BARCLAY, LLP**

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**CERTIFICATE OF SERVICE**

I certify that on July 20, 2011, I filed a copy of the foregoing document with the Clerk of the Court via the CM/ECF system, which gave notice to all counsel who have made an appearance in this action.

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s/ John D. Cook