

**IN THE UNITED STATES DISTRICT COURT,  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CEG HOLDINGS LLC,	)	
	)	
Plaintiff,	)	
	)	Case No. 09-4996
v.	)	
	)	
JACUZZI, INC.,	)	JURY DEMANDED
	)	
Defendant.	)	

**COMPLAINT FOR PATENT INFRINGEMENT**

NOW COMES the Plaintiff, CEG HOLDINGS LLC., through its attorneys, Keith H. Orum, Mark D. Roth and Beata Bukranova of ORUM & ROTH, LLC, and for its Complaint for Patent Infringement against the Defendant, JACUZZI, INC. (“Jacuzzi”) states:

**Jurisdiction**

1. This is a civil action for patent infringement, injunctive relief and damages arising under the United States Patent Act, 35 U.S.C. §1, *et. seq.* Jurisdiction is conferred upon this Court pursuant to 28 U.S.C. §1331 and 1338 (a). Defendant, Jacuzzi, is a Delaware corporation with its principal place of business in Chino, California. Defendant does significant business in Chicago, Illinois. Defendant is subject to personal jurisdiction in this Court and is amenable to service of process pursuant to Illinois’s Long-Arm Statute and Rule 4(e) of the Federal Rules of Civil Procedure.
2. Venue lies in this District pursuant to 28 U.S.C. §1391(b) and (c), and 1400(b).

**Parties**

3. Plaintiff is a limited liability company organized under the laws of the State of Indiana, with its principal place of business in Burr Ridge, Illinois.
4. Jacuzzi is a corporation organized under the laws of the State of Delaware. Jacuzzi maintains its principal place of business in Chino, California. Jacuzzi sells whirlpool tubs and related products throughout the United States, and specifically in the Chicagoland area.

**Infringement**

5. Plaintiff is the owner of United States Patent No. 6,357,060 entitled “Method And Apparatus For Purging Water From A Whirlpool System”, issued on March 19, 2002 (“’060 Patent”) and which is a valid and enforceable patent.
6. Defendant manufacturers, sells and offers for sale whirlpool tubs and spas that contain an ozone system which directly infringes one or more claims of the ‘060 Patent.
7. Defendant has been aware of the patent and that the method employed by the Defendant infringes the patent since at least May 2002. Defendant’s infringement is therefore willful.

**Prayer for Relief**

WHEREFORE, Plaintiff prays that judgment be entered against the Defendant, Jacuzzi, and requests the following relief:

- a. That the Defendant be held to have infringed the ‘060 Patent;
- b. That the Defendant and its subsidiaries, affiliates, franchisees, successors, assigns, officers, agents, servants, employees, customers, attorneys and all persons acting in concert and participation with them or any of them, be temporarily and preliminarily enjoined during the pendency of this action, and subsequently permanently enjoined,

from directly infringing, contributing to the infringement of and inducing infringement of the '060 Patent without express written authority of the Plaintiff.

- c. That the Defendant be directed to fully compensate Plaintiff for any and all damages attributable to Defendants' infringement of the '060 Patent in an amount to be proven at trial;
- d. That this case be deemed exceptional;
- e. That any damage award be trebled;
- f. That Plaintiff be awarded its reasonable attorney's fees;
- g. That Plaintiff be awarded costs of suit and an assessment of interest; and
- h. That Plaintiff has such other, further and different relief as this Court deems proper under the circumstances.

Respectfully submitted,

/Mark D. Roth/

Attorney for Plaintiff

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