

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NARTRON CORPORATION,

Plaintiff,

vs.

HONORABLE NANCY G. EDMUNDS

MAGISTRATE JUDGE KOMIVES

CIVIL ACTION NO. 03-75169

GENERAL ELECTRIC COMPANY,
MAYTAG CORPORATION and
TOUCHSENSOR TECHNOLOGIES LLC,

Defendants.

ERNIE L. BROOKS (P22875)
JOHN E. NEMAZI (P33285)
SANGEETA G. SHAH (P49242)
THOMAS W. CUNNINGHAM (P57899)
BROOKS KUSHMAN P.C.
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Attorneys for Plaintiff

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**AMENDED COMPLAINT FOR PATENT
INFRINGEMENT AND JURY DEMAND**

Plaintiff, Nartron Corporation, alleges against defendants, General Electric Company, Maytag Corporation and TouchSensor Technologies LLC, the following:



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I. THE PARTIES

1. Plaintiff, Nartron Corporation (“Nartron”), is a Michigan corporation having a principal place of business at 5000 North U.S. 131, Reed City, Michigan 49677.

2. Defendant, General Electric Company (“GE”), is a New York corporation with its principal place of business at Appliance Park, Building 2-225, Louisville, KY 40225.

3. Defendant, Maytag Corporation (“Maytag”), is a corporation with its principal place of business at 240 Edwards Street, Cleveland, TN 37311.

4. Defendant, TouchSensor Technologies LLC (“TouchSensor”), is an Illinois corporation with its principal place of business at 203 N. Gables Blvd., Wheaton, IL 60187.



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II. JURISDICTION AND VENUE

5. This action arises under Title 35 of the United States Code.
6. Jurisdiction is based on 28 U.S.C. §§ 1338 and 1367.
7. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(c).



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**III. COUNT I --
PATENT INFRINGEMENT UNDER 35 U.S.C. § 271**

8. On March 15, 1988, U.S. Patent No. 4,731,548 ("the '548 patent") was duly and lawfully issued to Nartron for a touch controlled switching circuit (copy attached as Exhibit A). Since that date, Nartron has been and still is the owner of that patent.

9. On July 19, 1988, U.S. Patent No. 4,758,735 ("the '735 patent") was duly and lawfully issued to Nartron for a DC touch control switch circuit (copy attached as Exhibit B). Since that date, Nartron has been and still is the owner of that patent.

10. On August 18, 1998, U.S. Patent No. 5,796,183 ("the '183 patent") was duly and lawfully issued to Nartron for a capacitive responsive electronic switching circuit (copy attached as Exhibit C). Since that date, Nartron has been and still is the owner of that patent.

11. On information and belief, defendant GE makes, uses, sells and/or offers to sell appliances throughout the United States, including within this judicial district. GE has been, and still is, willfully infringing, actively inducing infringement of, and contributorily infringing, the '548, '735 and '183 patents by making, using, offering to sell, and/or selling appliances that include capacitive touch switches.

12. On information and belief, defendant Maytag makes, uses, sells and/or offers to sell appliances throughout the United States, including within this judicial district. Maytag has been, and still is, willfully infringing, actively inducing infringement of, and



contributorily infringing, the '548, '735 and '183 patents by making, using, offering to sell, and/or selling appliances that include capacitive touch switches.

13. On information and belief, defendant TouchSensor makes, uses, sells and/or offers to sell capacitive touch sensors throughout the United States, including within this judicial district. TouchSensor has been, and still is, willfully infringing, actively inducing infringement of, and/or contributorily infringing, the '548, '735 and '183 patents by making, using, offering to sell, and/or selling its capacitive touch sensors.

14. Nartron has been, and will continue to be, irreparably harmed by defendants' infringement unless defendants are enjoined by this Court.

15. For the infringement, Nartron seeks damages in an amount adequate to compensate for defendants' infringement.



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IV. DEMAND FOR RELIEF

WHEREFORE, Nartron asks the Court to:

- A. enter a preliminary and permanent injunction to enjoin defendants from infringing the '548, '735 and '183 patents;
- B. award Nartron damages against defendants adequate to compensate for the infringement;
- C. award Nartron damages for willful infringement in accordance with 35 U.S.C. § 284;
- D. award Nartron reasonable attorney fees in accordance with 35 U.S.C. § 285;
- E. award Nartron interest and costs; and
- F. award Nartron such other relief as is just.



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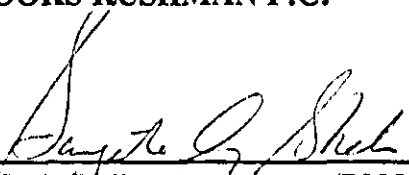
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V. DEMAND FOR JURY TRIAL

Nartron hereby demands a trial by jury for all issues so triable.

Respectfully submitted,

BROOKS KUSHMAN P.C.

By:  _____

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Dated: January 8, 2004



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