



COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Hegenscheidt-MFD GmbH & Co. KG and Hegenscheidt-MFD Corporation, (together, "Hegenscheidt"), through their undersigned counsel, state for their complaint for patent infringement against Lonero Engineering Company, Inc., ("Lonero") as follows:

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1. This action arises under the patent laws of the United States, and more specifically for patent infringement under Title 35, United States Code.
2. Hegenscheidt-MFD GmbH & Co. KG is a German corporation with a place of business in Erkelenz, Germany.
3. Hegenscheidt-MFD Corporation is a Michigan corporation with a place of business at 6255 Center Drive, Sterling Heights, Michigan.
4. Upon information and belief, Lonero is a Michigan corporation with a place of business at 2050 Stephenson Hwy, Troy, Michigan 48083.
5. Subject matter jurisdiction is conferred by 28 U.S.C. §§1331, 1332, and 1338, and venue is proper in this Court under 28 U.S.C. §§1391 and 1400.

6. On May 21, 2002, United States Patent No. 6,389,861 ("the '861 patent") was duly and legally issued for an invention entitled "ROLLER CAGE," a copy of which is attached hereto as Exhibit A.

7. Hegenscheidt-MFD GmbH & Co. KG is the current owner of the '861 patent.

8. Hegenscheidt-MFD Corporation is a wholly-owned subsidiary of Hegenscheidt-MFD GmbH & Co. KG and the exclusive distributor in the United States for products manufactured under the '861 patent.

9. Lonero has made, used, offered for sale, and sold Roller Cages in this district that infringe the '861 patent. Lonero's infringement has been direct, indirect, contributory, and/or by inducement. Lonero will continue to infringe unless enjoined by this Court.

10. Lonero has had actual knowledge of the '861 patent. Upon information and belief, Lonero has willfully, deliberately and wantonly infringed these patents.

DEMAND FOR RELIEF

WHEREFORE, Hegenscheidt requests a judgment that:

1. Lonero has infringed the '861 patent.

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2. Lonero, its agents, servants, officers, directors, employees and all acting in concert with it, through them, directly or indirectly, be enjoined from infringing, inducing other to infringe, or contributing to infringement of the '861 patent.

3. Lonero be ordered to account for and pay to Hegenscheidt the damages to which Hegenscheidt is entitled as a consequence of Lonero's infringement, and that in view of its acts of willful, deliberate, and intentional infringement such damages be trebled.

4. Hegenscheidt be awarded its costs and attorney fees in accordance with 35 U.S.C. §285.

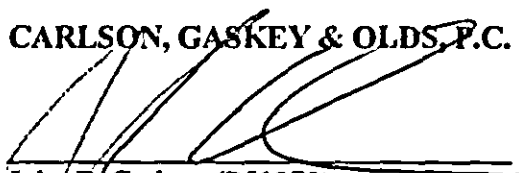
5. Hegenscheidt be awarded such other and further relief as the Court may deem just and equitable.

DEMAND FOR JURY TRIAL

Hegenscheidt hereby demands a trial by jury as to all issues triable by jury.

Respectfully submitted,

CARLSON, GASKEY & OLDS, P.C.



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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

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