

PILLSBURY WINTHROP SHAW PITTMAN LLP
DUANE H. MATHIOWETZ
50 Fremont Street
Post Office Box 7880
San Francisco, CA 94120-7880
Telephone: (415) 983-1000
Facsimile: (415) 983-1200

PILLSBURY WINTHROP SHAW PITTMAN LLP
NEIL VOHRA, SBN 270256
725 South Figueroa Street, Suite 2800
Los Angeles, CA 90017-5406
Telephone: (213) 488-7100
Facsimile: (213) 629-1033

Attorneys for Defendant
TEK GLOBAL S.R.L.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TEK GLOBAL S.R.L. and TEK
CORPORATION,

Plaintiffs,

vs.

SEALANT SYSTEMS INTERNATIONAL,
INC.,

Defendant.

No. CV 11-1649 PSG

(Consolidated with case CV 11-0774-
PSG)

FIRST AMENDED COMPLAINT
FOR PATENT INFRINGEMENT

Plaintiffs TEK Global S.r.l. and TEK Corporation (hereinafter "Plaintiffs"),
complaining of defendant, allege as follows:

1. Plaintiff TEK Global S.r.l. is an Italian limited liability company, having an
office and place of business at Via Icaro No. 11, Pesaro (PU) Italy.

2. Plaintiff TEK Corporation is a Michigan corporation, having an office and
principal place of business at 450 Robbins Dr., Troy, Michigan 48083.

1 3. Upon information and belief defendant Sealant Systems International Inc.
2 (hereinafter "SSI") is a corporation organized and existing under the laws of the State of
3 California, having an office and principal place of business at 800 Farroll Road, Grover
4 Beach CA 93433.

5 4. The present claim is for infringement of a U.S. patent pursuant to the U.S.
6 Patent Law, 35 U.S.C. § 1, *et seq.* The court has subject matter jurisdiction over the claim
7 pursuant to 28 U.S.C. 1338(a). The court has jurisdiction over defendant SSI and venue in
8 this district is proper pursuant to 28 U.S.C. 1391 and 1400.

9 5. Plaintiff TEK Global S.r.l. is the owner by assignment of U.S. Pat. No.
10 7,789,110 for a "Kit For Inflating And Repairing Inflatable Articles ("the '110 Patent"),
11 which covers tire repair kits that include an air compressor and a container of sealant that
12 allows the user to repair tire punctures by the controlled injection of the sealant into the tire.
13 A three-way valve system allows the user to direct the compressor air flow either to the
14 sealant and then into the kit's delivery hose or directly into the hose and into the tire. A
15 copy of the '110 Patent is annexed as Exhibit A. The '110 Patent issued from application
16 No. 10/591,033, which was published as US2008/0029181 on February 7, 2008. The '110
17 Patent is valid and enforceable.

18 6. Plaintiff TEK Corporation is the exclusive licensee of the '110 Patent for
19 North America, and markets, sells and distributes tire repair kits as claimed in the '110
20 patent.

21 7. Defendant SSI is a manufacturer and distributor of automotive tire repair
22 kits. SSI sells such kits to automobile manufacturers in the United States, who include such
23 kits in vehicles sold throughout the United States. Upon information and belief SSI also
24 supplies such kits to automobile retailers and other third parties for direct sale to the
25 consuming public. Exemplary of such kits is the Lexus "F Sport" kit, item No. 70019. A
26 copy of the cover for the owner's manual for the F Sport kit is annexed as Exhibit B. Upon
27 information and belief a similar kit is present in Chevrolet Camaro vehicles sold by General
28 Motors.

8. Defendant SSI has been and is directly infringing the '110 Patent in this judicial district, in California and elsewhere, by at least importing and/or manufacturing, offering for sale and selling the F Sport tire repair kit, the Camaro tire repair kit, and other tire repair kits that include, *inter alia*, a compressor, a sealant tank, and a valve system as set forth in the '110 Patent, without the permission or authorization of Plaintiffs. Defendant has and continues to indirectly infringe the '110 Patent by actively inducing others to infringe the '110 Patent and contributing to the infringement of the '110 Patent in the United States.

9. Plaintiff TEK Global, through its counsel, sent a letter on or about November 2, 2009 to SSI at its California headquarters putting SSI on notice pursuant to 35 U.S.C. § 154(d) that SSI's automatic onboard tire repair system appears similar to the subject matter of two pending published patent applications, including the application that issued as the '110 Patent, and that once the patent (or patents) issued, Plaintiff would be entitled to compensation from SSI for its use of the inventions claimed therein. A true and correct copy of that letter is attached as Exhibit C. SSI did not respond to that letter.

10. On November 22, 2010, Plaintiff TEK Global, through its counsel, sent a second letter to SSI at its California headquarters indicating that TEK Global had filed an infringement suit against SSI in the Southern District of New York. Plaintiff further indicated that it had previously brought the infringement to SSI's attention in the hopes that the matter could be addressed and resolved amicably, but having received no response, the current action was commenced to protect SSI's rights. A true and correct copy of that letter is attached as Exhibit D.

11. Defendant SSI's aforementioned acts have caused damage to Plaintiffs and will continue to do so unless enjoined.

12. SSI's infringement has been intentional and with full knowledge of the '110 Patent, making this an exceptional case pursuant to 35 U.S.C. § 284.

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JURY DEMAND

13. Plaintiffs demand that all claims and causes of action raised in this Complaint against Defendant be tried to a jury.

WHEREFORE, Plaintiff prays:

1. That the Court find defendant SSI to have infringed the '110 Patent;

2. That the Court preliminarily and permanently enjoin defendant SSI and its agents, officers, employees and attorneys, and all persons in active concert or participation with them, from further infringing the '110 Patent;

3. That the Court award Plaintiffs their damages resulting from the infringement;

4. That the Court award Plaintiffs a reasonable royalty for SSI's use of the inventions of the '110 Patent from at least November 2, 2009 to the date the '110 Patent issued, September 7, 2010, pursuant to 35 U.S.C. § 154(d);

5. That the Court find that defendant SSI's acts of infringement were intentional and that the present case is therefore an exceptional case under 35 U.S.C. § 284, and that Plaintiffs be awarded increased damages accordingly;

6. That Plaintiffs be awarded their attorneys' fees, costs, expert witness fees, and expenses incurred by Plaintiffs in connection with this present action pursuant to 35 U.S.C. § 285; and

7. That the court award such further relief to Plaintiffs as just and proper in the circumstances.

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1 Dated: September 19, 2011

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3 PILLSBURY WINTHROP SHAW PITTMAN LLP
4 DUANE H. MATHIOWETZ
5 50 Fremont Street
6 Post Office Box 7880
7 San Francisco, CA 94120-7880

8
9 NEIL VOHRA, SBN 270256
10 725 South Figueroa Street, Suite 2800
11 Los Angeles, CA 90017-5406

12
13 By /s/ Duane Mathiowetz

14 Attorneys for Plaintiffs
15 TEK Global S.r.l. and
16 TEK Corporation
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EXHIBIT A

US007789110B2

(12) **United States Patent**
Marini

(10) **Patent No.:** **US 7,789,110 B2**
(45) **Date of Patent:** **Sep. 7, 2010**

(54) **KIT FOR INFLATING AND REPAIRING INFLATABLE ARTICLES, IN PARTICULAR TYRES**

(75) Inventor: **Maurizio Marini, Pesaro (IT)**

(73) Assignee: **Tek Global S.R.L., Pesaro (PU) (IT)**

(*) Notice: Subject to any disclaimer, the term of this patent is extended or adjusted under 35 U.S.C. 154(b) by 556 days.

(21) Appl. No.: **10/591,033**

(22) PCT Filed: **Feb. 8, 2005**

(86) PCT No.: **PCT/IB2005/000309**

§ 371 (c)(1),
(2), (4) Date: **Jul. 26, 2007**

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PCT Pub. Date: **Sep. 15, 2005**

(65) **Prior Publication Data**

US 2008/0029181 A1 Feb. 7, 2008

(30) **Foreign Application Priority Data**

Feb. 27, 2004 (IT) TO2004A0117

(51) **Int. Cl.**

B65B 1/04 (2006.01)

B65B 31/00 (2006.01)

(52) **U.S. Cl.** **141/38; 141/98; 152/415**

(58) **Field of Classification Search** **141/38, 141/41, 98; 152/415**

See application file for complete search history.

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Primary Examiner—Gregory L Huson

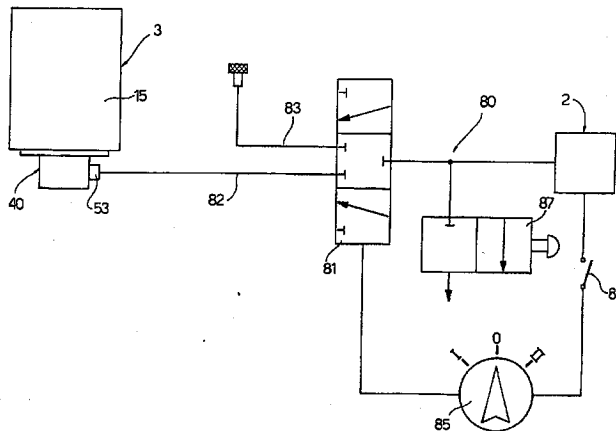
Assistant Examiner—Nicolas A Arnett

(74) *Attorney, Agent, or Firm*—Ladas & Parry LLP

(57) **ABSTRACT**

A kit for inflating and repairing inflatable articles, in particular tires, the kit having a compressor assembly, a container of sealing liquid and connectors for connecting the container to the compressor assembly and to an inflatable article for repair or inflation; the compressor assembly being housed in an outer casing defining a seat for the container of sealing liquid. The container is housed removably in the seat and functionally connected to the compressor assembly so as to form a compact unit ready for use.

31 Claims, 4 Drawing Sheets



US 7,789,110 B2

Page 2

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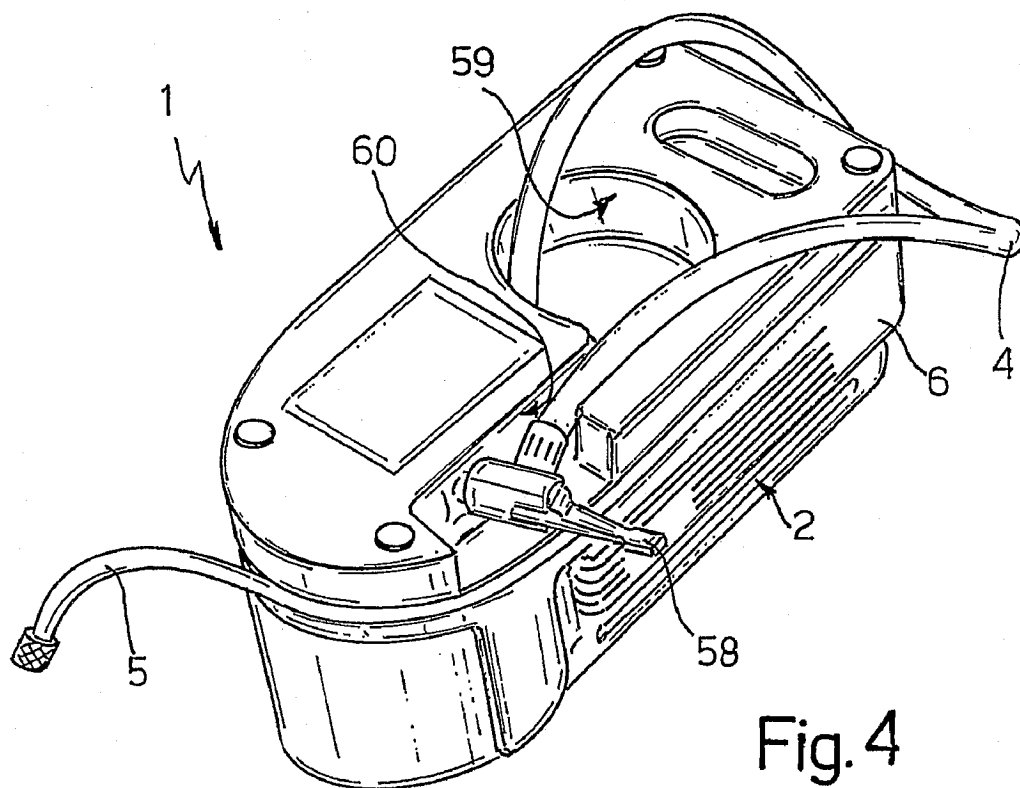
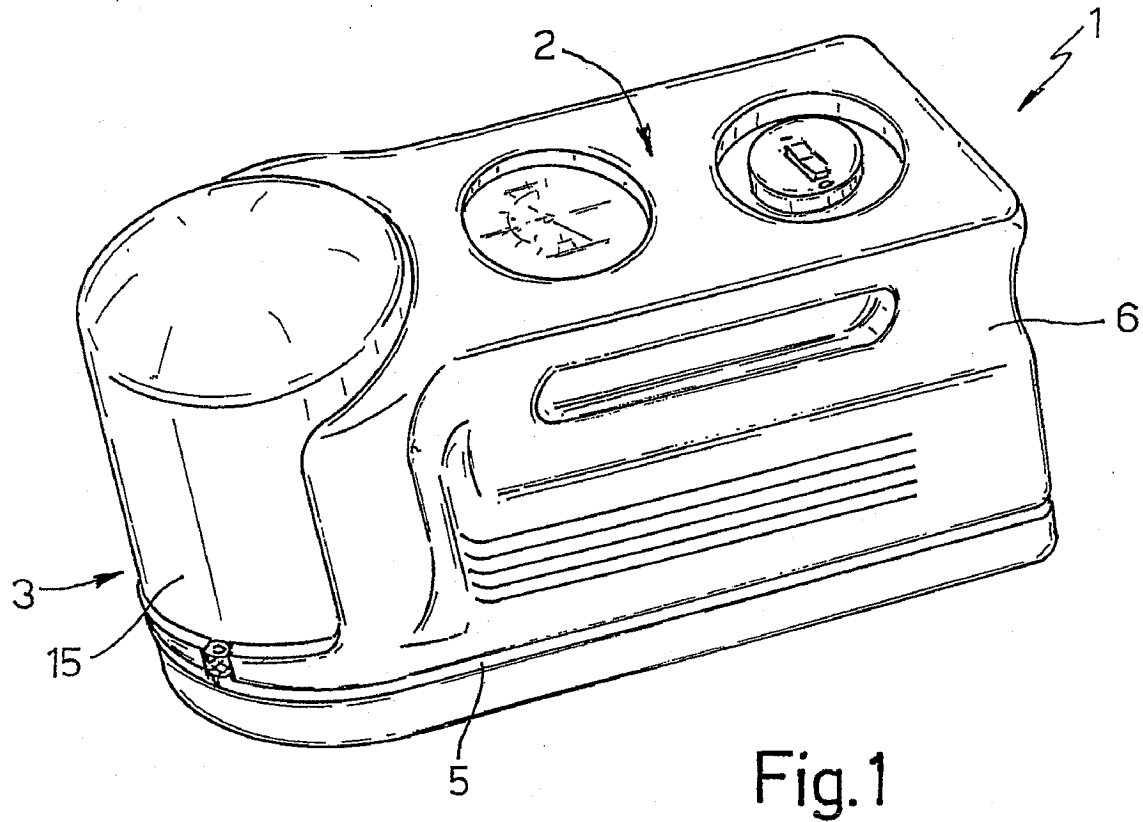
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U.S. Patent

Sep. 7, 2010

Sheet 1 of 4

US 7,789,110 B2



U.S. Patent

Sep. 7, 2010

Sheet 2 of 4

US 7,789,110 B2

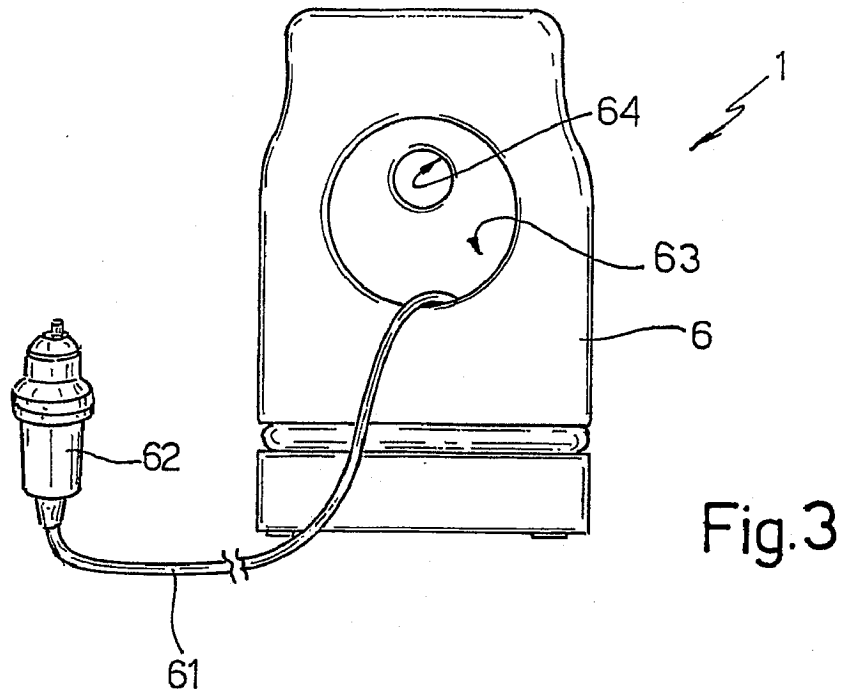


Fig. 3

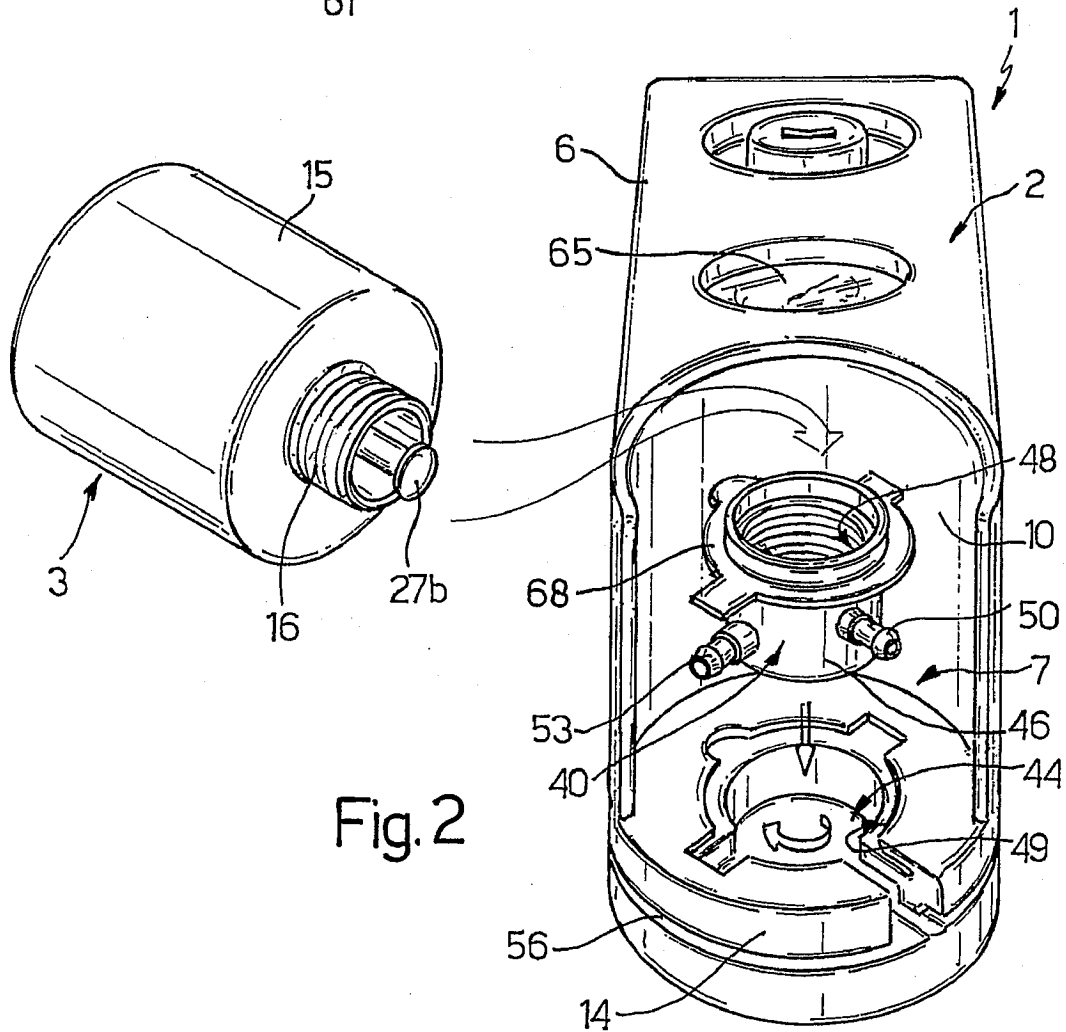


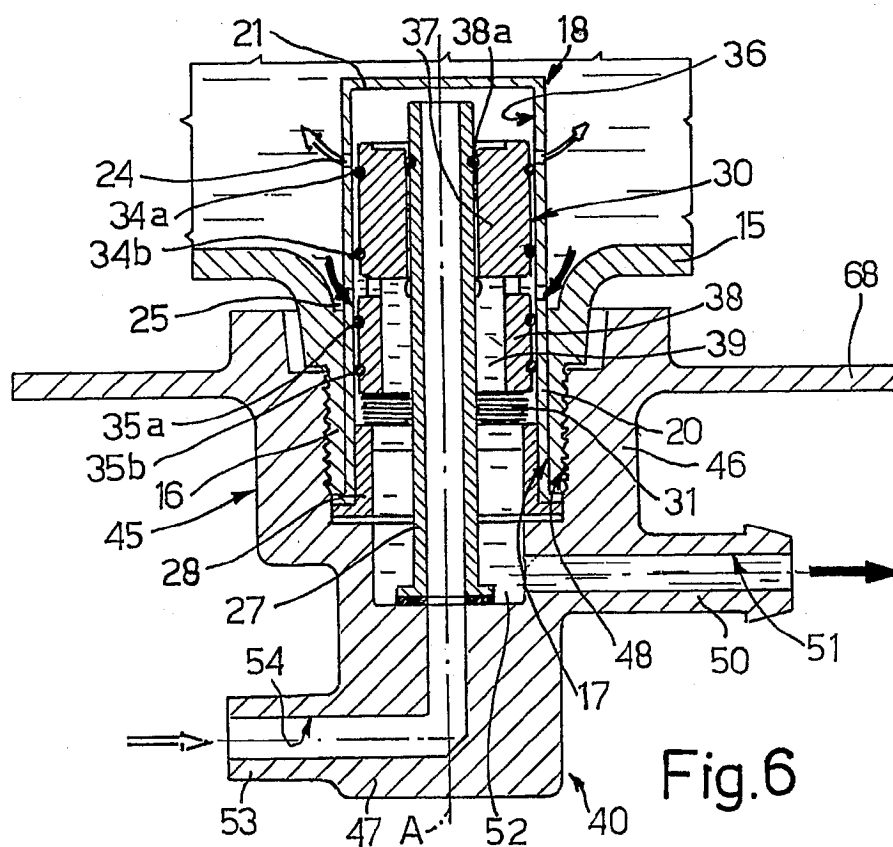
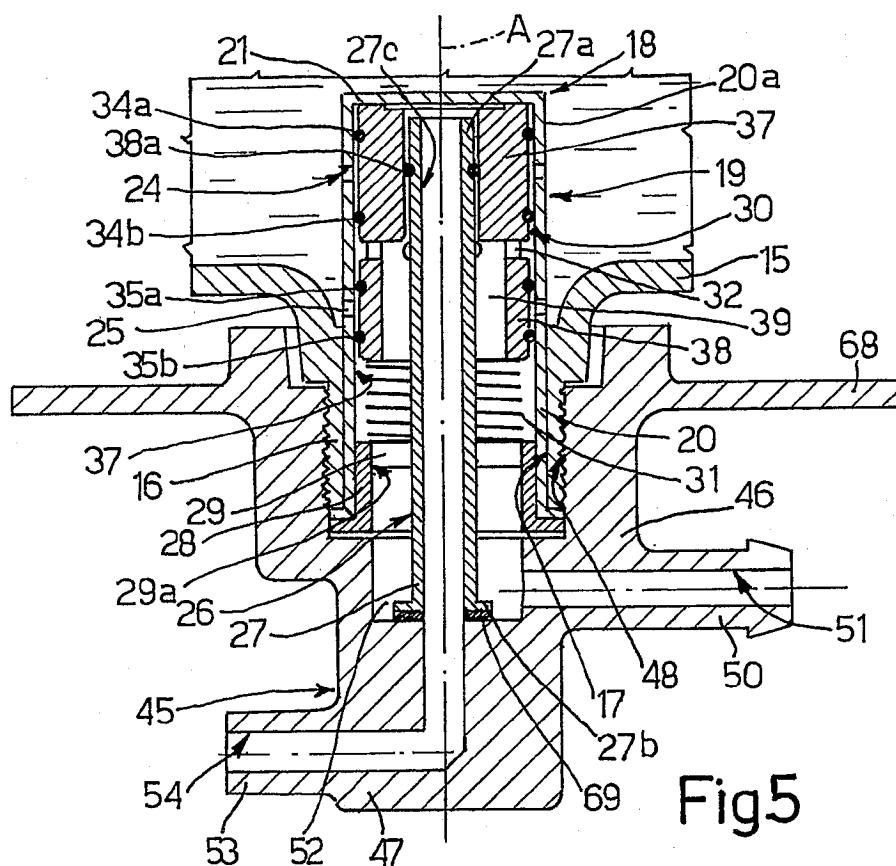
Fig. 2

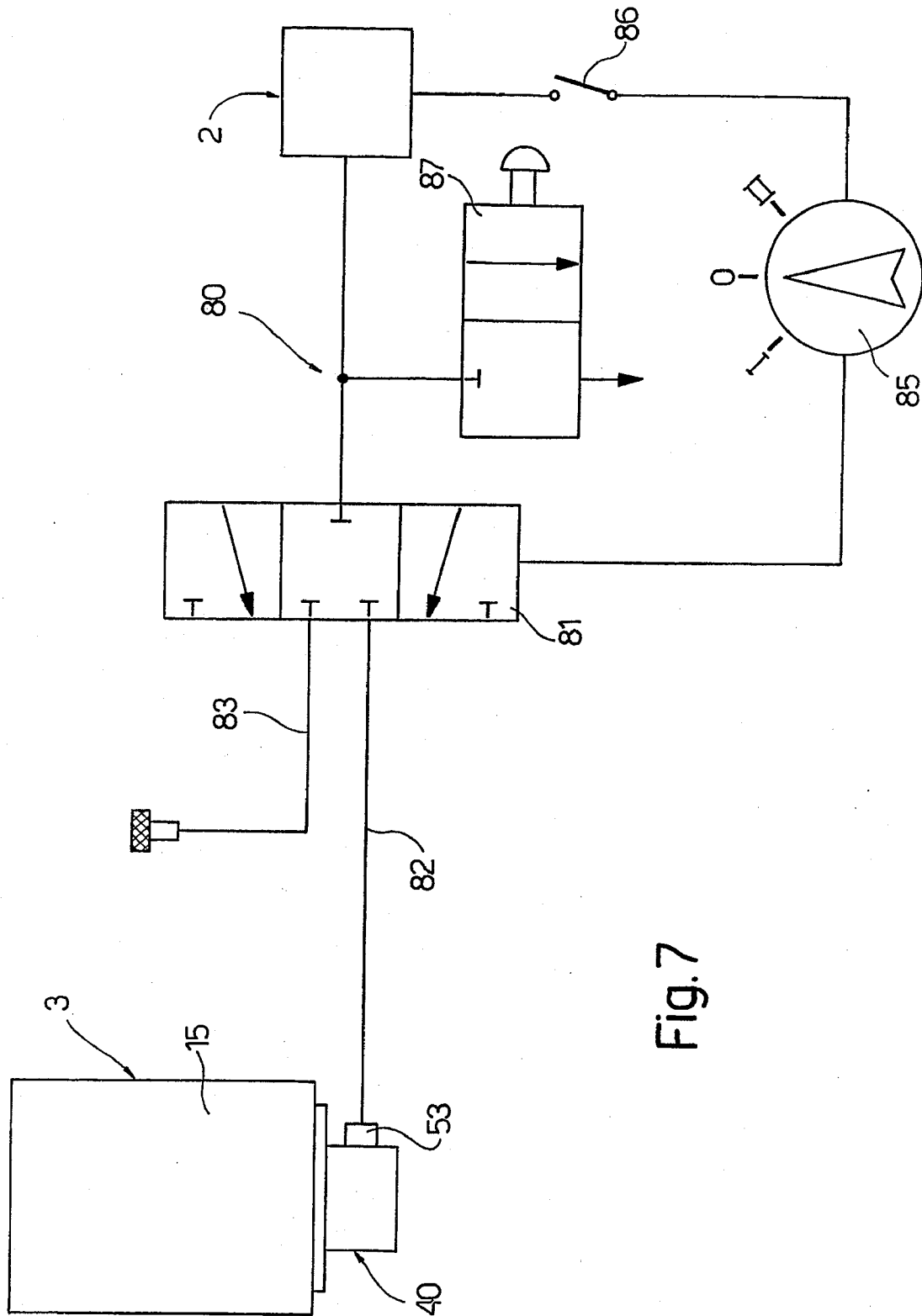
U.S. Patent

Sep. 7, 2010

Sheet 3 of 4

US 7,789,110 B2





US 7,789,110 B2

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KIT FOR INFLATING AND REPAIRING INFLATABLE ARTICLES, IN PARTICULAR TYRES

TECHNICAL FIELD

The present invention relates to a kit for inflating and repairing inflatable articles, in particular, tyres.

BACKGROUND ART

Sealing liquids for fast repair of inflatable articles are known. The liquid is fed into the article for repair by means of compressed air, e.g. by means of a compressor, penetrates any holes or slits in the article, and sets on contact with air, thus rapidly sealing the article.

Such liquids are widely used for fast tyre repair, to which the following description refers for the sake of clarity and purely by way of example.

Vehicle spare wheels pose a number of well-known problems, not least of which are their considerable size and weight.

More specifically, if the wheel is housed inside the vehicle, normally in a compartment to the side of or beneath the boot, the capacity of the boot is greatly reduced, and the tyre is difficult to remove, especially when the boot is full.

Conversely, if stowed outside the vehicle, normally in a compartment beneath the floor, or attached to the rear door, the wheel can easily be stolen and is still not easy to remove.

Given the good road conditions in most countries, punctures are now rare, so that changing a wheel can prove extremely difficult, if not impossible, on account of the bolts being locked tight, and in any case is awkward by being performed in critical conditions (traffic, poor lighting, bad weather). Considerable advantage is to be gained, therefore, by replacing the spare wheel with a repair and inflation kit comprising a small compressor and a container of sealing liquid, which can be stowed easily in a special compartment or in the boot of the car.

In addition to the big reduction in size and weight, puncture repair is also made faster and easier: as opposed to changing the wheel, the compressor is simply connected to a current outlet on the vehicle, the container of sealing liquid is connected to the compressor and to the valve of the tyre for repair, and the compressor is started to feed the liquid into the tyre. For this purpose, the container normally has a dispenser unit comprising an inlet conduit and an outlet conduit connected respectively, by respective conduits, to the compressor and the valve of the tyre for repair.

The container and the compressor are normally separate parts that must be connected prior to use, and which at most are housed for convenience inside the same holder.

This therefore involves additional work prior to use.

In one known solution, the container is fitted permanently to the dispenser unit, which incorporates a sealing device. The container, in itself open, is therefore undetachable from the dispenser unit.

Another drawback of this solution is that, when the use-by date of the sealing liquid expires, both the container and the dispenser unit must be replaced, thus increasing cost.

In another known solution, the container itself is sealed, e.g. by a sealing membrane, which is split when the container is fitted to the dispenser unit. This means also the dispenser unit must be fitted to the container just prior to use, thus making additional work.

2

DISCLOSURE OF INVENTION

It is an object of the present invention to provide a kit for repairing and inflating inflatable articles, designed to eliminate the aforementioned drawbacks typically associated with known kits.

According to the present invention, there is provided a kit for inflating and repairing inflatable articles, in particular, tyres; the kit comprising a compressor assembly, a container of sealing liquid, and connecting means for connecting the container to the compressor assembly and to an inflatable article for repair or inflation, and being characterized by comprising an outer casing housing said compressor assembly and defining a seat for the container of sealing liquid, said container being housed removably in said seat, and by comprising connecting means for stably connecting said container to said compressor assembly, so that the container, when housed in said seat, is maintained functionally connected to said compressor assembly.

BRIEF DESCRIPTION OF THE DRAWINGS

A preferred, non-limiting embodiment of the present invention will be described by way of example with reference to the accompanying drawings, in which:

FIG. 1 shows a view in perspective of a repair kit comprising a container of sealing liquid and in accordance with the present invention;

FIG. 2 shows a partly disassembled view in perspective of the FIG. 1 kit;

FIGS. 3 and 4 show a rear view and underside view in perspective respectively of the FIG. 1 kit partly disassembled;

FIGS. 5 and 6 show sections, along line V-V in FIG. 2, of the container and a dispenser unit of the FIG. 2 kit assembled together;

FIG. 7 shows a schematic of a pneumatic circuit connected to the FIG. 2 kit dispenser unit.

BEST MODE FOR CARRYING OUT THE INVENTION

Number 1 in FIGS. 1 to 4 indicates as a whole a kit for fast repair of inflatable articles, in particular, tyres.

Kit 1 substantially comprises an electric compressor assembly 2; a container 3 of sealing liquid; a first hose 4 connecting container 3 to compressor assembly 2; and a second hose 5 connecting container 3 to a valve (not shown) of the tyre.

In known manner not shown, compressor assembly 2 comprises an electric motor and a compressor—powered by the electric motor—which are housed inside an outer casing 6.

Casing 6 is substantially parallelepiped-shaped and, at one longitudinal end, defines a seat 7 for housing container 3 upside down. More specifically, seat 7 is bounded laterally by a substantially semicylindrical end wall 10 of casing 6, and at the bottom by a circular base 14 projecting from end wall 10.

Container 3 comprises a vessel 15, preferably in the form of a bottle, containing the sealing liquid and having an externally threaded neck 16 defining an opening 17 (FIGS. 5 and 6); and a valve device 18 housed in opening 17. Valve device 18 forms an integral part of container 3, to ensure the container is closed fluidtight when detached from the rest of kit 1, as explained in detail below.

Valve device 18 comprises a body 19 having a cylindrical lateral wall 20, of axis A, inserted in fluidtight manner inside neck 16, and a portion 20a of which extends beyond neck 16, into vessel 15, and is closed at one end by an end wall 21.

US 7,789,110 B2

3

Portion 20a has two circumferential series of holes 24, 25 communicating with the inside of vessel 15, spaced axially apart, and located close to end wall 21 and close to neck 16 respectively.

Body 19 of valve device 18 also comprises an inner member 26 defined by a tubular rod 27 of axis A, and by a supporting ring 28 fixed inside an open end of body 19 and connected integrally to tubular rod 27 by a number of spokes 29 forming a number of axial passages 29a.

Rod 27 has a first end portion 27a close to end wall 21, and a conveniently flanged second end portion 27b projecting axially outwards of body 19, and defines internally an axial passage 27c.

Valve device 18 comprises a tubular slide 30, which slides axially inside the annular chamber 36 formed between body 19 and rod 27. Slide 30 is maintained in an axial stop position against end wall 21 by a helical spring 31 compressed axially between slide 30 and supporting ring 28.

Slide 30 has a circumferential series of holes 32 formed at an outer annular groove 33 dividing the slide into two portions 37, 38. Slide 30 also comprises two pairs of outer, axially spaced sealing rings (O-rings) 34a, 34b and 35a, 35b, which are housed in respective annular seats and form a sliding seal between slide 30 and body 19. The two pairs of O-rings 34a, 34b and 35a, 35b are located on axially opposite sides of holes 32. More specifically, O-rings 34a, 34b are carried by portion 37 facing end wall 21, and O-rings 35a, 35b are carried by portion 38 facing end portion 27b of rod 27. In said axial stop position of slide 30, O-ring 34a is located between holes 24 and end wall 21; O-ring 34b is located between holes 24 and holes 32; O-ring 35a is located between holes 25 and holes 32; and O-ring 35b is located on the axially opposite side of holes 25 to O-ring 35a.

Portion 37 of slide 30 slides in fluidtight manner on rod 27, preferably with the interposition of an O-ring 38a on rod 27. Portion 38 of slide 30 is larger in inside diameter than rod 27, and defines with rod 27 a chamber 39 open towards the flanged end portion 27b of rod 27 and communicating with holes 32.

Kit 1 also comprises a dispenser unit 40, which is housed stably but detachably inside a recess 44 in base 14 of casing 6, and is connected detachably to container 3 to fit it, upside down, to casing 6 (FIGS. 1, 5 and 6).

More specifically, dispenser unit 40 substantially comprises a plug-like central portion 45 having a substantially cylindrical lateral wall 46 and an end wall 47, which define an internally threaded cavity 48 into which neck 16 of vessel 15 is screwed; and a circular flange 68 extending radially from central portion 45 and defining a bayonet connection with corresponding fastening means 49 in base 14 of casing 6.

Dispenser unit 40 also comprises a first tubular fitting 50 projecting radially from central portion 45 and defining a conduit 51 communicating with and radial with respect to a bottom portion 52 of cavity 48; and a substantially pipe-like second tubular fitting 53 projecting radially, close to end wall 47 of central portion 45, in a radial direction perpendicular to that of first tubular fitting 50. Second tubular fitting 53 defines a conduit 54 communicating coaxially with bottom portion 52 of cavity 48.

When container 3 is screwed into dispenser unit 40, end portion 27b of tubular rod 27—possibly fitted with an annular sealing member 69 on the end—cooperates in fluidtight manner with end wall 47 of central portion 45, so that the internal axial passage 27c of rod 27 communicates with and substantially constitutes an extension of conduit 54 (FIGS. 5 and 6).

Base 14 has lateral openings (one shown in FIG. 4) through which fittings 50, 53 are accessible from outside casing 6,

4

once dispenser unit 40 is bayonet connected inside recess 44 in base 14, e.g. by rotating it 45° with respect to the FIG. 2 insertion position.

First fitting 50 is connected to hose 5, which, when not in use, may be wound about the casing and housed inside a peripheral groove 56 in the casing; and second fitting 53 is connected to compressor 2 by hose 4. Conveniently, hose 4 is longer than required for connection to fitting 53, and is fitted on its free end with a fast-fit, e.g. lever-operated, coupling 58. Hose 4 is therefore normally connected to second fitting 53, but can be detached easily and connected directly to the article, e.g. a tyre, ball, dinghy, etc., if this simply needs inflating and not repair. Hose 4 is normally stowed almost entirely inside a seat 59 formed on the underside of casing 6, from which it extends along an underside groove 60 housing the end portion of hose 4 fitted with coupling 58.

Second fitting 53 is located at a different height from first fitting 50, so as to avoid any interference with hose 5 wound about casing 6.

Compressor assembly 2 has an electric power cable 61 fitted on the end with a connector 62 for connection to a current outlet on the vehicle. Cable 61 is normally housed in a seat 63 formed in a portion of casing 6 opposite seat 7 for container 3, and connector 62 is stowed inside a cavity 64 in seat 63. Compressor assembly 2 is conveniently provided with a gauge 65 and a switch 66.

Kit 1 and particularly container 3 operate as follows.

Kit 1 is an integrated preassembled unit, which is supplied ready for use as shown in FIG. 1.

To repair an inflatable article, e.g. a tyre, hose 5 is simply connected to the tyre valve, and compressor assembly 2 activated.

The air pressure along hose 4, fitting 50, and internal passage 27c of rod 27, is transmitted to the end of annular chamber 36, and exerts thrust on the end surface of slide 30 adjacent to end wall 21.

Slide 30 therefore moves, in opposition to spring 31, from the FIG. 5 rest position to the FIG. 6 position, in which O-rings 34a, 34b are interposed between holes 24 and holes 25, and O-ring 35a has moved past holes 25, so that holes 32 in slide 30 communicate with holes 25. Compressed air therefore flows through holes 24 into container 3, which is therefore pressurized, so that sealing liquid flows through holes 25 and holes 32 into chamber 39 in slide 30, and is fed along fitting 50 and hose 5 to the tyre.

Device 18 therefore acts as a two-way, two-position, pneumatic valve. In the closed position (FIG. 5), the container is sealed; with pressure along the feed line defined by hose 4, device 18 opens automatically to allow compressed air into container 3, and simultaneous outflow of sealing liquid.

The advantages of kit 1 according to the present invention will be clear from the foregoing description.

In particular, kit 1 is a compact, integrated unit that can be stowed ready for use, with no additional work required, other than connection to the vehicle electric system and to the tyre.

Container 3 with an integrated valve device 18 constitutes an independent sealed unit, regardless of whether or not it is connected to dispenser unit 40.

After use, or when the sealing liquid use-by date expires (normally after a few years), only container 3 need be replaced. That is, dispenser unit 40 need not be replaced, and may be left permanently inside casing 6.

Using a two-way valve device 18 closed stably in the absence of pressure along the feed line 4, sealing liquid leakage is prevented, even in abnormal conditions, such as overpressure in container 3 caused by high temperature inside the boot of a car parked in the sun.

US 7,789,110 B2

5

Using a valve device 18, container 3 is ready for use at all times, i.e. fitted permanently to kit 1. Container 3, in fact, is sealed but operated immediately in response to turning on the compressor.

Unit 40 is preferably detachable from casing 6 and carried by container 3.

Clearly, changes may be made to kit 1 as described herein without, however, departing from the scope of the accompanying Claims.

In particular, FIG. 7 shows a diagram of a pneumatic sealing liquid dispensing circuit 80 comprising a three-way, three-position valve 81, a conduit 82 connected to second fitting 53, and an additional hose 83 connectable to the tyre. Valve 81 is input connected to the compressor of compressor assembly 2, and is output connected to conduit 82 and additional hose 83.

Valve 81 is controlled by a hand-operated selector 85 located on casing 6 and cooperating with an on-switch 86 of compressor assembly 2. In use, selector 85 defines a disabling position, in which on-switch 86 is disabled and compressor assembly 2 cannot be started, thus preventing it from being turned on accidentally; and a first and second enabling position, in which on-switch 86 is enabled to start the compressor. More specifically, in the first enabling position, valve 81 is switched automatically to connect the compressor to dispenser unit 40 via second fitting 53 and disconnect additional hoses 83; and, in the second enabling position, valve 81 is switched automatically to connect the compressor to additional hose 83 and disconnect dispenser unit 40. Additional hose 83 is housed in casing 6, and enables compressor assembly 2 to be used quickly and easily to inflate a flat tyre.

Pneumatic circuit 80 and hose 5 may also be connected to one or more hand-operated relief valves 87, to prevent overpressure in conduit 82 and hoses 5 and 83, or, when the compressor is off, to accurately adjust the pressure of the inflatable article as required.

The end of hose 5 connected to the tyre may be fitted with a non-return valve, to prevent sealing liquid leakage when hose 5 is detached from the tyre.

Container 3 may also be connected to casing 6 by a click-on coupling acting in a direction parallel to axis A.

The invention claimed is:

1. A kit for inflating and repairing inflatable articles; the kit comprising a compressor assembly (2), a container (3) of sealing liquid, and connecting means (4, 5) for connecting the container to the compressor assembly (2) and to an inflatable article for repair or inflation, and being characterized by comprising an outer casing (6) housing said compressor assembly (2) and defining a seat (7) for the container (3) of sealing liquid, said container (3) being housed removably in said seat (7), and by comprising container connecting means (4, 40) for stably connecting said container to said compressor assembly (2), so that the container, when housed in said seat (7), is maintained functionally connected to said compressor assembly (2), said kit further comprising an additional hose (83) cooperating with said inflatable article; and a three-way valve (81) input connected to said compressor assembly (2), and output connected to said container (3) and to said additional hose (83) to direct a stream of compressed air selectively to said container (3) or to said additional hose (83).

2. A kit as claimed in claim 1, characterized in that said connecting means comprise a compressed-air feed line (4) for feeding compressed air from said compressor assembly (2) to said container (3); said container (3) comprising a vessel (15) having an opening (17), and a valve device (18) fitted in fluid-tight manner to the opening (17) and having an inlet

6

(27c) connectable to said compressed-air feed line (4), and an outlet (29a) for the sealing liquid.

3. A kit as claimed in claim 2, characterized in that said valve device (18) comprises at least one control member (30) movable, in response to pressurization of said compressed-air feed line (4), from a closed position, closing said valve device (18) and in which said inlet (27c) and said outlet (29a) are isolated from the inside of said container (3), to an open position in which said inlet (27c) and said outlet (29a) communicate with the inside of said container (3).

4. A kit as claimed in claim 3, characterized in that said valve device (18) comprises elastic means (31) for keeping said control member (30) stably in said closed position in the absence of pressure to said inlet (27c).

5. A kit as claimed in claim 2, characterized in that said container connection means comprise dispenser unit (40) connectable detachably to said container (3) and having an inlet fitting (53) connected in fluid-tight manner to said inlet (27c) of said valve device (18), and an outlet fitting (50) connected in fluid-tight manner to said outlet (29a) of said valve device (18).

6. A kit as claimed in claim 5, characterized in that said dispenser unit is detachable from said casing.

7. A kit as claimed in claim 6, characterized in that said seat (7) comprises a base portion (14) having fast-fit fastening means (49) by which to secure said dispenser unit (40) to said casing (6).

8. A kit as claimed in claim 7, characterized in that said fastening means (49) comprise a bayonet connection.

9. A kit as claimed in claim 7, characterized in that said fastening means comprise a fast-fit click-on coupling.

10. A kit as claimed in claim 5, characterized in that said dispenser unit (40) comprises a cavity (48) to which is fitted a neck (16) of said container (3) in an upside down position; said neck (16) defining said opening (17).

11. A kit as claimed in claim 1, characterized in that said three-way valve (81) is controlled by a selector (85) which can be set to a disabling position, in which operation of said compressor assembly (2) is disabled; to a first enabling position, in which operation of said compressor assembly (2) is enabled, and said container (3) is connected fluidically to said compressor assembly (2); and to a second enabling position, in which operation of said compressor assembly (2) is enabled, and said additional hose (83) is connected fluidically to said compressor assembly (2).

12. A kit as claimed in claim 11, characterized in that said connecting means comprise a compressed-air feed line (4) for feeding compressed air from said compressor assembly (2) to said container (3); said container (3) comprising a vessel (15) having an opening (17), and a valve device (18) fitted in fluid-tight manner to the opening (17) and having an inlet (27c) connectable to said compressed-air feed line (4), and an outlet (29a) for the sealing liquid.

13. A kit as claimed in claim 12, characterized in that said valve device (18) comprises at least one control member (30) movable, in response to pressurization of said compressed-air feed line (4), from a closed position, closing said valve device (18) and in which said inlet (27c) and said outlet (29a) are isolated from the inside of said container (3), to an open position in which said inlet (27c) and said outlet (29a) communicate with the inside of said container (3).

14. A kit as claimed in claim 13, characterized in that said valve device (18) comprises elastic means (31) for keeping said control member (30) stably in said closed position in the absence of pressure to said inlet (27c).

15. A kit as claimed in claim 11, characterized in that said container connection means comprise dispenser unit (40)

US 7,789,110 B2

7

connectable detachably to said container (3) and having an inlet fitting (53) connected in fluid-tight manner to said inlet (27c) of said valve device (18), and an outlet fitting (50) connected in fluid-tight manner to said outlet (29a) of said valve device (18).

16. A kit as claimed in claim 15, characterized in that said dispenser unit is detachable from said casing.

17. A kit as claimed in claim 16, characterized in that said seat (7) comprises a base portion (14) having fast-fit fastening means (49) by which to secure said dispenser unit (40) to said casing (6).

18. A kit as claimed in claim 17, characterized in that said fastening means (49) comprise a bayonet connection.

19. A kit as claimed in claim 17, characterized in that said fastening means comprise a fast-fit click-on coupling.

20. A kit as claimed in claim 15, characterized in that said dispenser unit (40) comprises a cavity (48) to which is fitted a neck (16) of said container (3) in an upside down position; said neck (16) defining said opening (17).

21. A kit as claimed in claim 11, characterized in that at least one of said connecting means (4) and said additional hose (83) is connected to a relief valve (87).

22. A kit as claimed in claim 11, characterized in that said connecting means (5) comprise a non-return valve.

23. A kit as claimed in claim 1, characterized in that at least one of said connecting means (4) and said additional hose (83) is connected to a relief valve (87).

24. A kit as claimed in claim 1, characterized in that said connecting means (5) comprise a non-return valve.

25. A kit as claimed in claim 1 wherein said additional hose (83) when not in use is housed in a peripheral groove (56) at least partly surrounding the outer casing (6).

26. A kit for inflating and repairing inflatable articles; the kit comprising a compressor assembly, a container of sealing liquid, and conduits connecting the container to the compressor assembly and to an inflatable article for repair or inflation, said kit further comprising an outer casing housing said compressor assembly and defining a seat for the container of

8

sealing liquid, said container being housed removably in said seat, and additionally comprising a container connecting conduit connecting said container to said compressor assembly, so that the container, when housed in said seat, is maintained functionally connected to said compressor assembly, said kit further comprising an additional hose cooperating with said inflatable article; and a three-way valve input connected to said compressor assembly, and output connected to said container and to said additional hose to direct a stream of compressed air selectively to said container or to said additional hose.

27. The kit as claimed in claim 26 wherein at least one of said conduits connecting the container to the compressor assembly and said container connecting comprises a hose.

28. A kit as claimed in claim 26 wherein said three-way valve is controlled by a selector which can be set to a disabling position, in which operation of said compressor assembly is disabled; to a first enabling position, in which operation of said compressor assembly is enabled, and said container is connected fluidically to said compressor assembly; and to a second enabling position, in which operation of said compressor assembly is enabled, and said additional hose is connected fluidically to said compressor assembly.

29. A kit as claimed in claim 26, wherein said valve device comprises at least one control member movable, in response to pressurization of said compressed-air feed line, from a closed position, closing said valve device and wherein said inlet and said outlet are isolated from the inside of said container, to an open position in which said inlet and said outlet communicate with the inside of said container (3).

30. A kit as claimed in claim 26, wherein said valve device comprises a spring for keeping said control member stably in said closed position in the absence of pressure to said inlet.

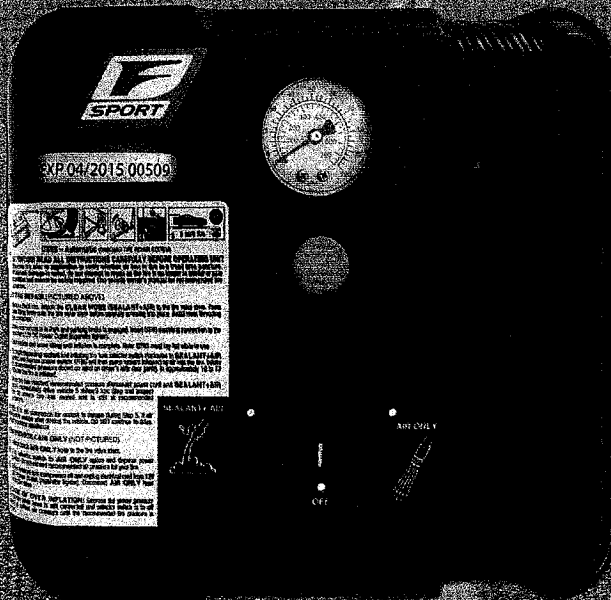
31. A kit as claimed in claim 26 wherein said additional hose when not in use is housed in a peripheral groove at least partly surrounding the outer casing.

* * * * *

EXHIBIT B



By Lexus USA



OWNER'S MANUAL EMERGENCY TIRE REPAIR KIT

EXHIBIT C

LADAS & PARRY LLP
INTELLECTUAL PROPERTY LAW

John Richards



iferraro@ladas.com
212.708.1915

26 West 61st Street • New York, New York 10023-7604
P 212.708.1800 • F 212.246.8959 • F 212.246.8925 • nymail@ladas.com • www.ladas.com

November 2, 2009

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

President
Sealant Systems International
800 Parroll Road
Grover Beach, Ca. 93433

Dear Sirs:

Notice under 35 USC 154(d)
Our ref NPSP 091513

We act for TEK S.R.L and TEK GLOBAL both of Pesaro Italy, the owners of inventions of tire repair and inflation kits described in US Published Patent Applications 2008/0029181 and 2008/0277044 which are currently pending before the United States patent and Trademark Office. We enclose copies of the two patent publications. Please also note that other foreign members of the respective patent families comprise: EP1961632 (granted and attached), CN1926018 (ready for grant), CA2557556, BR-PI0508105 for US application 2008/0029181 and DE102008022954, CN101311044 and ITTO20070323 for US application 2008/0277044.

We are aware of your automatic onboard tire repair system which appears similar to the subject matter of our client's patent applications.

If you disagree, we would appreciate hearing from you by November 20. If not, please consider this letter as a notification under 35 USC 154(d) and that once its patents are granted, our clients will be entitled to compensation from you for any use that you make of its inventions from this point onwards.

Very truly yours,

John Richards

224 South Michigan Avenue, Chicago, IL 60604 • 5670 Wilshire Boulevard, Los Angeles, CA 90036
1-2 Bolt Court, London EC4A 3DQ, England • Dachauerstrasse 37, 80335 Munich, Germany

EXHIBIT D

LADAS & PARRY LLP
INTELLECTUAL PROPERTY LAW

Jay A. Bondell
Of Counsel



jbondell@ladas.com
212.708.1805

26 West 61st Street • New York, New York 10023-7604
P 212.708.1800 • F 212.246.8959 • F 212.246.8925 • nymail@ladas.com • www.ladas.com

November 22, 2010

Chief Operating Officer
Sealant Systems International, Inc.
800 Farroll Road
Grover City CA 93433

Re: TEK Global S.R.L.
Civil Action No. 10 CIV 8757 - U.S. D.C. - S.D.N.Y.


Dear Chief Operating Officer:

We Are counsel to TEK Global S.R.L. of Pesaro Italy. On behalf of our client we have commenced suit in United States District Court for the Southern District of New York against Sealant Systems International, Inc. for patent infringement. Two copies of a Notice of Lawsuit, along with a blank Waiver form and a copy of our complaint are enclosed. Please review the Notice.

Our client has previously brought the infringement to your attention, in the hopes that the matter could be addressed and resolved amicably. As it received no response, the current action has been commenced to protect our client's rights. Our client remains desirous of seeking a resolution to the matter without protracted litigation, but is prepared to prosecute the present action as may be required to have its patent rights vindicated.

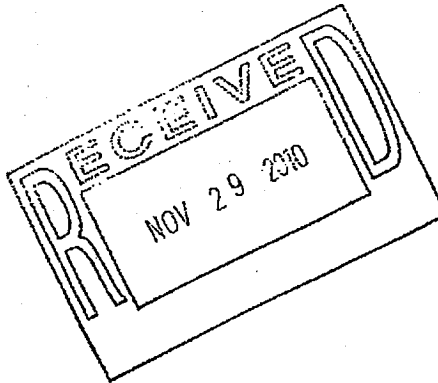
We again look forward to hearing from you.

Very truly yours,


Jay A. Bondell

JAB:bj
Encs.

cc: TEK Global S.R.L.



224 South Michigan Avenue, Chicago, IL 60604 • 5670 Wilshire Boulevard, Los Angeles, CA 90036
1-2 Bolt Court, London EC4A 3DQ, England • Dachauerstrasse 37, 80335 Munich, Germany