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Attorneys for Plaintiff Flexpoint Sensor Systems, Inc. and Sensitron, Inc.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF UTAH

FLEXPOINT SENSOR SYSTEMS, INC., a Utah Corporation, and SENSITRON, INC., a Utah Corporation

Plaintiffs,

v.

IMAGES SI, INC., a New York Corporation, John C. Iovine, an individual residing in New York,

Defendants.

AMENDED COMPLAINT

Civil No. 2:09-cv-344

Honorable Clark Waddoups

Plaintiffs, Flexpoint Sensor Systems, Inc. (hereinafter referred to as "Flexpoint") and Sensitron, Inc. (hereinafter referred to as "Sensitron") complain of Defendants Images SI, Inc. (hereinafter referred to as "Images") and John C. Iovine (hereinafter referred to as "Iovine") as

set forth in t he causes of action herein after. Images and Iovine are collectively referred to as "Defendants":

JURISDICTION AND VENUE

1. This Complaint states claims for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 271, et. seq, for trademark infringement under the trademark laws of the United States, 15 U.S.C. §§ 1051-1127, under the unfair competition laws of the state of Utah, Utah Code Ann § 13-5-2.5 et seq. and under the common law of the State of Utah. This Court has jurisdiction over the subject matter of the Complaint under 28 U.S.C. §§ 1338(a)and 1367 as well as by 15 U.S.C. §1121 and 28 U.S.C. §§ 1331, 1338 and 1367. Venue is proper in this district under 28 U.S.C. §§ 1391(b)-(d) and 1400(b).

PLAINTIFFS

- 2. Flexpoint is a Utah Corporation having a place of business at 106 West 12200 South Draper, Utah 84020. Sensitron is a wholly owned subsidiary of Flexpoint also with a place of business at 106 West 12200 South Draper, Utah 84020. Flexpoint together with Sensitron own all right, title and interest in and to, including the right to sue for infringement of:
 - United States Letters Patent No. 5,157,372 which issued on October 20, 1992 for a Flexible Potentiometer (hereinafter referred to as the "'372 Patent").
 - United States Letters Patent No. 5,583,476 which issued on December 10, 1996 for a Flexible Potentiometer (hereinafter referred to as the "476 Patent")
 - The trademark BEND SENSOR along with US Trademark registration No. 2,183,090 that issued on August 18, 1998 for the mark "BEND SENSOR" along with all goodwill associate therewith (the "Mark").

3. Flexpoint and Sensitron and their predecessors pioneered the invention and development of flexible potentiometers which they or their predecessors have been offering for sale and selling since at least 1996 under the trademark BEND SENSOR®.

DEFENDANTS

- 4. Images is a New York Corporation headquartered at 109 Woods of Arden Road,
 Staten Island NY 10312. Images markets and distributes various scientific instruments including
 BEND SENSOR® detectors throughout the United States at least in part through its website
 www.imagesco.com.
- 5. On information and belief, Iovine is principal owner of Images and has made all decisions to cause Images to make, use and sell products that Flexpoint and Sensitron have alleged herein to infringe the '372 Patent and the '476 Patent and to cause Images to use the Mark to cause confusion. Upon information and belief, Iovine resides at 109 Woods of Arden Road, Staten Island NY 10312.
- 6. Images now offers for sale and is selling, under the direction and control of Iovine, a line of flexible potentiometers know as the FLX 01, the FLX 02, the FLX 03 (style A and style B), the FSC 01-04 and FLX-001-OOS using the mark BEND SENSOR. Each of the FLX 01, the FLX 02, the FLX 03 (style A and style B), the FSC 01-04 and FLX-001-OOS fall within the scope of at least claim 1 of the '372 Patent and claim 1 of the '476 Patent. Also, Images, under the direction and control of Iovine, is using the Mark BEND SENSOR without license or authority or other colorable right from FLEXPOINT and SENSITRON.

COUNT I

INFRINGEMENT OF AND INDUCEMENT TO INFRINGE '372 PATENT

- 7. Plaintiff realleges and incorporates by this reference Paragraphs 1-6 above the same as if fully set forth herein.
- 8. SENSITRON and FLEXPOINT have marked and are continuing to mark all of the BEND SENSOR® products sold by either or both with the patent number for the '372 Patent as required by 35 U.S.C. § 287 art all times relevant.
- 9. Images is now offering for sale and has been offering for sale, and selling the FLX 01, the FLX 02, the FLX 03 (style A and style B), the FSC 01-04 and FLX-001-OOS (hereinafter the "FLX Products"). Each of the FLX Products falls within the scope of at least claim 1 of the '372 Patent.
- 10. Upon information and belief, Images and Iovine had knowledge of either or both of Flexpoint and Sensitron and of the BEND SENSOR® detectors offered for sale by Flexpoint and Sensitron, and of the '372 Patent, all prior to the first offer for sale and sale of any one or all of the FLX Products by Images.
- 11. Upon information and belief, Images has been and is now unlawfully infringing, literally or under the doctrine of equivalents, at least claim 1 of the '372 Patent by at least using, offering to sell, advertising for sale and selling each and all of the FLX Products in the state of Utah and throughout the United States.

- 12. Upon information and belief, Iovine has been and is now unlawfully inducing Images to unlawfully infringe, literally or under the doctrine of equivalents, at least claim 1 of the '372 Patent by at least using, offering to sell, advertising for sale and selling any one and all of the FLX Products the in the state of Utah and throughout the United States.
- 13. The unlawful and unauthorized, manufacture, use and sale of the FLX Products by Images and the inducement of Images to do so by Iovine has injured Flexpoint and Sensitron, jointly and severally. Flexpoint and Sensitron each continue to suffer injury, which injury is irreparable as a direct result of the unlawful infringement by Images, and in turn Flexpoint and Sensitron are each entitled to recover damages against Images and Iovine adequate to compensate Flexpoint and Sensitron for such infringement, but in no event less than a reasonable royalty.
- 14. Flexpoint and Sensitron each continue to suffer injury which irreparable injury as a direct result of the unlawful infringement of the '372 Patent by Images, and in turn Flexpoint and Sensitron are each entitled to preliminary and permanent injunctions restraining and enjoining each of Images and Iovine, and all those in active consort therewith from making, using, offering for sale and selling any one or more products that fall within the scope of any one or more claims of the '372 Patent directly and/or under the doctrine of equivalents.
- 15. The Defendants have each acted willfully and wantonly and in total disregard for the rights of Flexpoint and Sensitron. In turn this is an exceptional case and Flexpoint and Sensitron are in turn entitled to increased damages under the provisions of 35 U.S.C. § 284 plus all of their attorneys fees under the provisions of 35 U.S.C. § 285.

COUNT II

<u>INFRINGEMENT OF AND INDUCEMENT TO INFRINGE</u> '476 PATENT

- 16. Plaintiff realleges and incorporates by this reference Paragraphs 1-15 above the same as if fully set forth herein.
- 17. Sensitron and Flexpoint at all relevant times there to have marked and continue to mark all of the BEND SENSOR® products sold by both with the patent number as required by 35 U.S.C. § 287.
- 18. Images is now offering for sale and has been offering for sale, and selling the FLX 01, the FLX 02, the FLX 03 (style A and style B), the FSC 01-04 and FLX-001-OOS (hereinafter the "FLX Products"). Each of the FLX Products fall within the scope of at least claim 1 of the '476 Patent.
- 19. Upon information and belief, Images and Iovine had knowledge of either Flexpoint and/or Sensitron, of the BEND SENSOR® detectors offered for sale by Flexpoint and Sensitron, and of the '476 Patent, all prior to the first offer for sale and sale by Images and Iovine.
- 20. Upon information and belief, Images has been and is now unlawfully infringing, literally or under the doctrine of equivalents, at least claim 1 of the '476 Patent by using, offering to sell, advertising for sale and selling any one and all of the FLX Products in the state of Utah and throughout the United States.

- 21. Upon information and belief, Iovine has been and is now unlawfully inducing Images to unlawfully infringe, literally or under the doctrine of equivalents, at least claim 1 of the '476 Patent by at least using, offering to sell, advertising for sale and selling any one and all of the FLX Products.
- 22. The unlawful and unauthorized, manufacture, use and sale of each of the FLX Products by Images and the inducement of Images to do so by Iovine has injured Flexpoint and Sensitron, jointly and severally. Flexpoint and Sensitron each continue to suffer injury which injury is irreparable as a direct result of the unlawful infringement by Images, and in turn Flexpoint and Sensitron are each entitled to recover damages against Images and Iovine, jointly and severally, adequate to compensate it for such infringement, but in no event less than a reasonable royalty.
- 23. Flexpoint and Sensitron each continue to suffer injury which injury is irreparable as a direct result of the unlawful infringement of the '372 Patent by Images, and in turn Flexpoint and Sensitron are each entitled to preliminary and permanent injunctions restraining and enjoining each of Images and Iovine, and all those in active consort therewith from making, using, offering for sale and selling any one or more products that fall within the scope of any one or more claims of the '372 Patent directly and/or under the doctrine of equivalents.
- 24. The Defendants have each acted willfully and wantonly and in total disregard for the rights of Flexpoint and Sensitron. In turn this is an exceptional case and Flexpoint and Sensitron are in turn entitled to increased damages under the provisions of 35 U.S.C. § 284 plus all of its attorneys fees under the provisions of 35 U.S.C. § 285.

COUNT III

STATUTORY TRADEMARK INFRINGEMENT

- 25. Plaintiff realleges and incorporates Paragraphs 1-24 above the same as if fully set forth herein.
- 26. Since at least 1996, Flexpoint has been using the trademark "Bend Sensor" in connection with flexible potentiometers. On August 18, 1998, Flexpoint received a Federal Trademark Registration in the phrase "Bend Sensor" (U.S. Registration Number 2,183,090). (Attached hereto as "Exhibit A").
- 27. Flexpoint and Sensitron have created substantial goodwill in connection with the flexible potentiometers it sells in association with the trademark BEND SENSOR.
- 28. Flexpoint and Sensitron have marked the trademark BEND SENSOR with the symbol ® so that Defendants have had constructive notice of the rights of Flexpoint and Sensitron for all times relevant hereto. Further, upon information and belief, Images and Iovine have had actual notice of the rights of Sensitron and Flexpoint.
- 29. Images, under the control and direction of Iovine, is using the term "Bend Sensor" on its web site as seen on the Attached "Exhibit B". The use of the mark "Bend Sensor" by Images under the control and direction of Iovine is likely to cause confusion and, upon information and belief, is causing confusion. In turn, Defendant Images under the direction and control of Iovine are unlawfully infringing the trademark rights of Flexpoint and Sensitron in violation of 15 U.S.C. § 1114.

- 30. By reason of Defendants' actions, Plaintiffs have suffered and are continuing to suffer irreparable harm to Plaintiffs' Mark and the goodwill associated therewith. To prevent further and continuing irreparable harm to Sensitron and Flexpoint, each of the Defendants should be preliminarily and permanently enjoined from using the term "Bend Sensor" and any other term that is or will likely lead to confusion with the mark "Bend Sensor" of Plaintiffs under the provisions of 15 U.S.C. § 1116.
- 31. As a direct and proximate result of Defendants' unlawful infringement, Plaintiffs have been injured by Defendants; and Plaintiffs are entitled to the recover damages to include an accounting for, and a disgorgement of, all revenues and/or profits wrongfully derived by Defendants from its unlawful infringing use of Plaintiffs' Mark Bend Sensor plus all of the lost profits of Plaintiffs, all pursuant to 15 U.S.C. § 1117.

COUNT IV

COMMON LAW TRADEMARK INFRINGEMENT

- 32. Plaintiff realleges and incorporates Paragraphs 1-31 above the same as if fully set forth herein.
- 33. Since at least 1996, Flexpoint has been using the trademark "Bend Sensor" in connection with flexible potentiometers through out the United States and in turn has developed goodwill and rights in the mark "Bend Sensor."
- 34. Flexpoint and Sensitron have marked all of its flexible potentiometers with the trademark BEND SENSOR Upon information and belief, Images and Iovine have had actual notice of the trademark rights of Sensitron and Flexpoint to the trademark Bend Sensor.

- 35. Images, under the control and direction of Iovine is using the term "Bend Sensor" on its web site as seen on the Attached "Exhibit B" without license or right from Sensitron and Flexpoint. The use of the mark "Bend Sensor" by Images under the control and direction of Iovine is likely to cause confusion and, upon information and belief, is causing confusion. In turn, Defendant Images under the direction and control of Iovine are unlawfully infringing the common law trademark rights of Flexpoint and Sensitron
- 36. By reason of Defendants' actions, Plaintiffs have suffered and are continuing to suffer irreparable harm to Plaintiffs' Mark and the goodwill associated therewith. To prevent further irreparable harm to Sensitron and Flexpoint, each of the Defendants should be preliminarily and permanently enjoined from using the term "Bend Sensor and any other term that is or will likely lead to confusion with the mark "Bend Sensor" of Plaintiffs...
- 37. As a direct and proximate result of Defendants' conduct, Plaintiffs have been unlawfully injured by Defendants, and Plaintiffs are entitled to the recover damages to include an accounting for, and a disgorgement of, all revenues and/or profits wrongfully derived by Defendants.
- 38. Defendants have acted willfully and wantonly in total disregard of the trademark rights of Flexpoint and Sensitron and with an intent to harm Flexpoint and Sensitron, and in turn
- 39. Flexpoint and Sensitron are entitled to exemplary and punitive damages in an amount to be set by the court but which Flexpoint and Sensitron believe should be in the amount of no less than \$100,000.00.

COUNT V

UNLAWFUL CONFUSION AS TO SOURCE

- 40. Plaintiff realleges and incorporates by this reference Paragraphs 1-39 above the same as if fully set forth herein.
- 41. Since at least 1996, Flexpoint has been using the trademark "Bend Sensor" in connection with flexible potentiometers.
- 42. Flexpoint and Sensitron have created substantial goodwill in connection with the flexible potentiometers it sells in connection with the trademark "Bend Sensor".
- 43. Flexpoint and Sensitron have marked all use of the trademark "Bend Sensor" with the symbol ® so that Defendants have had constructive notice of the rights of Flexpoint and Sensitron. Further, upon information and belief, Images and Iovine have had actual notice of the rights of Sensitron and Flexpoint.
- 44. Images, under the control and direction of Iovine, is using the term "Bend Sensor" on its web site as seen on the Attached "Exhibit B". The use of, *inter alia*, the mark "Bend Sensor" by Images, under the control and direction of Iovine, is likely to cause confusion as to the source of goods and, upon information and belief, is causing confusion. In turn, Defendant Images under the direction and control of Iovine are unlawfully causing confusion as to the source of goods in violation of 11 U.S.C. § 1125(a).
- 45. By reason of Defendants' unlawful causing of confusion as to the source of goods, Plaintiffs have suffered and are continuing to suffer irreparable harm. To prevent further irreparable harm to Sensitron and Flexpoint, each of the Defendants should be preliminarily and

permanently enjoined from use of terms and a presentation including use of the work using the term BEND SENSOR and any other term that is or will likely lead to confusion its actions.

Plaintiffs will continue to be irreparably harmed under the provisions of 15 U.S.C. § 1116.

46. As a direct and proximate result of Defendants' conduct, Plaintiffs have been unlawfully injured by Defendants; and Plaintiffs are entitled to the recover damages to include an accounting for, and a disgorgement of, all revenues and/or profits wrongfully derived by Defendants from its unlawful infringing use of Plaintiffs' Marks plus all of the lost profits of Plaintiffs pursuant to 15 U.S.C. § 1117.

COUNT VI

UNFAIR COMPETITION

- 47. Flexpoint repeats and realleges each and every allegation of paragraphs 1-46 as though fully set forth herein.
 - 48. Images acts constitute unfair competition with Flexpoint and Sensitron.
- 49. Flexpoint and Sensitron have been injured are entitled to recover damages and to an injunction enjoining the unlawful acts of Defendants and also to increased damage as provided in Utah Code Ann Section 13-5-14.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully requests this Court enter judgment against each defendant and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with each of them, granting the following relief:

- (1) Be enjoined and restrained during the pendency of this action and permanently thereafter from:
 - (a) using the trademark "Bend Sensor";
 - (b) selling products identified in the bend sensor section of the Images' website as of March 2, 2009, as shown in Exhibit B, or any other similar goods;
 - (c) further infringing the patents-in-suit.
- (2) In regard to patent infringement claims; that Images be required to:
 - (a) pay an award of damages adequate to compensate Flexpoint and Sensitron for the patent infringement that has occurred, together with the prejudgment interest from the date of infringement of each respective patent-in-suit began, and costs;
 - (b) an award to Flexpoint and Flexitron of all remedies available under 35 U.S.C. § 284;
 - (c) a finding that this case is exceptional and an award to Flexpoint and Sensitron of all remedies available under 35 U.S.C. § 285.
- (3) In regard to trademark infringement claims; that Images be required to:
 - (a) account for and pay over to Plaintiffs a sum equal to three times all profits derived by Images from its acts complained of herein, in accordance with 15 U.S.C. §§ 1117(b);
 - (b) pay to Plaintiffs a sum equal to three times the damages Flexpoint and Sensitron have suffered as a result of the acts of Images complained herein, in accordance with 15 U.S.C. §§ 1117(b);
 - (c) be awarded exemplary and punitive damages of no less than \$100,000.00 under common law trademark rights;

(d) in the alternative, and at Plaintiffs' election, statutory damages for willful counterfeiting, pursuant to 15 U.S.C. §§ 1117(b);

(e) pay to Flexpoint the costs of this action together with reasonable attorneys' fees and

disbursements, in accordance with 15 U.S.C. § 1117;

(f) withdraw or recall from any and all channels of distribution products and advertising

material distributed by it or anyone acting in concert or participation with it bearing any

description or representation in violation of the Lanham Act;

(g) deliver up for destruction all packages, literature, labels, advertising and other materials

of an infringing, misleading, or unfair nature in Images or Iovines possession or control

and all plates, molds, matrices and other means of making the same, in accordance with

15 U.S.C. § 1118; and

(h) file with this Court and serve on Flexpoint and Sensitron a report in writing under oath

setting forth in detail the manner and form in which Images has complied with the terms

of any injunction entered by this Court, in accordance with 15 U.S.C. §1116.

(4) Flexpoint have such further relief as this Court deems just and equitable.

HOWARD, PHILLIPS & ANDERSEN

Kevin A. Howard

Gregory D. Phillips

s/Gregory D. Phillips

By: Gregory D. Phillips

Attorneys for Plaintiffs Flexpoint

Sensor Systems, Inc. and Sensitron, Inc.

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EXHIBIT A

Int. Cl.: 9

Prior U.S. Cls.: 21, 23, 26, 36, and 38

Reg. No. 2,183,090

United States Patent and Trademark Office

Registered Aug. 18, 1998

TRADEMARK SUPPLEMENTAL REGISTER

BEND SENSOR

FLEXPOINT, INC. (UTAH CORPORATION) 636 WEST 7250 SOUTH SALT LAKE CITY, UT 84047 FLEXPOINT, INC. (UTAH CORPORATION)

636 WEST 7250 SOUTH SALT LAKE CITY, UT 84047

FOR: FLEXIBLE RESISTORS, NAMELY, ELECTRONIC COMPONENTS PRESENTING ELECTRICAL RESISTANCE UPON APPLICATION OF AN ELECTRICAL POTENTIAL IN WHICH THE CONDUCTIVITY OF THE COMPONENT VARIES IN A GENERALLY PRE-

DICTABLE MANNER WHEN THE COMPONENT IS MAGNETICALLY DEFLECTED, IN CLASS 9 (U.S. CLS. 21, 23, 26, 36 AND 38).

FIRST USE 7-0-1996; IN COMMERCE 7-0-1996.

NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "SENSOR", APART FROM THE MARK AS SHOWN.

SER. NO. 75-108,803, FILED P.R. 4-18-1996; AM. S.R. 2-18-1998.

DEBORAH R. GREENBERG, EXAMINING ATTORNEY

EXHIBIT B

http://www.imagesco.com/sensors/flex-sensor.html



- Home
- Site Map
- Shopping Cart

<u>Home</u> > <u>Site Map</u> > <u>Sensors</u> > **Flexible Bend Sensors**

Bi-Directional Flexible Bend Sensors

Bi-Directional Flexible Bend Sensors - FLX-01

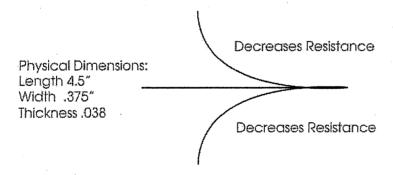
Images new bi-directional Bi-Flex Sensor is a unique component that changes resistance when bent. An un flexed sensor has a nominal resistance of 10,000 ohms (10 K). As the flex sensor is bent in either direction the resistance gradually decreases.

Sensor is also pressure sensitive, and may be used as a force or pressure sensor. The flex sensor operating temperature is -45F to 125F.



The sensor measures 3/8 inch wide, 41/2 inches long and only .038 inches thick! To see the dimensions <u>Click Here</u>

Nominal resistance at 0 degrees 10 K ohms



Some applications for the Flex Sensor are:

- Collision detection on mobile robots
- VR Gloves and VR suits
- Physics applications and experiments

Available in three resistance ranges:

http://www.imagesco.com/sensors/flex-sensor.html

- FLX-01-L Low resistance range, nominal resistance between 1K 20K
- FLX-01-M Medium resistance range, nominal resistance between 20K 50K
- FLX-01-H High resistance range, nominal resistance between 50K 200K

FLX-01 - \$9.95 Bi-Directional Bend Sensor

FLX-01-L

Enter Quantity: 1

Add to cart

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Bi-Directional Flexible Bend Sensors - FLX-02

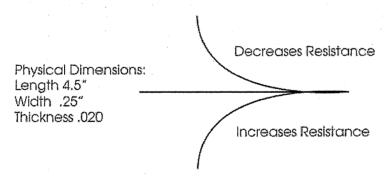
Images new bi-directional Bi-Flex Sensor (Pat. Pending) is a unique component that changes resistance when bent or flex in either direction. An un flexed sensor has a nominal resistance of 25,000 ohms (25 K). As the flex sensor is bent in one direction the resistance gradually increases. When the sensor is bent in the other direction its resistance will gradually decrease. Range of nominal resistances of the FLX-02 sensor may vary between 10K and 40K.

The flex sensor operating temperature is -45F to 125F.



The sensor measures 1/4 inch wide, 4 1/2 inches long and only .019 inches thick! To see the dimensions Click Here

Nominal resistance at 0 degrees 25 K ohms



Some applications for the Flex Sensor are:

- Collision detection on mobile robots
- VR Gloves and VR suits
- Physics applications and experiments

FLX-02 - \$14.95 Flexible Bend Sensor

http://www.imagesco.com/sensors/flex-sensor.html

Enter Quantity: 1

Add to cart

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Uni-Directional Flexible Bend Sensors

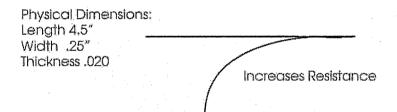
Uni-Directional Flexible Bend Sensors - FLX-03

Images new uni-directional Flex Sensor (Pat. Pending) is a unique component that changes resistance when bent or flexed . An un flexed sensor has a nominal resistance of 25,000 ohms (25 K). As the flex sensor is bent in one direction the resistance gradually increases. Range of nominal resistances of the FLX-03 sensor may vary between 10K and 40K.

The flex sensor operating temperature is -45F to 125F.



The sensor measures 1/4 inch wide, $4\ 1/2$ inches long and only .019 inches thick! To see the dimensions <u>Click Here</u>



Some applications for the Flex Sensor are:

- Collision detection on mobile robots
- VR Gloves and VR suits
- Physics applications and experiments

Available in two resistance ranges:

- FLX-03-L Low resistance range, nominal resistance is approximately 12K +/- 20%. With a 90° bend increase in resistance is approximately 50%
- FLX-03-M Medium resistance range, nominal resistance is approximately 15K +/- 20%. With a 90° bend increase in resistance is approximately 50%

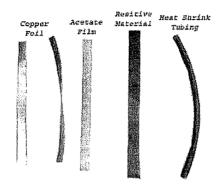
FLX-03 - \$9.95 Flexible Bend Sensor

http://www.imagesco.com/sensors/flex-sensor.html

FLX-03-L

Enter Quantity: 1 Add to cart

Bi-directional Flex Sensor Components



Flex Sensor Construction Article

FSC-01 \$2.50 Single sided 6" x 2" laminated copper FSC-02 \$2.50 5" x 3" resistive material FSC-03 \$1.00 4" x 5.5" .010 Acetate FSC-04 \$1.00

 $^{3}/_{8}$ " Heat shrink tubing 1 foot

FSC-01 Single sided 6" x 2" Laminated Copper \$2.50 🕏

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Out of Spec Bi-directional Flex Sensors

All sensors are operational, but are out of specifications for

varying reasons. Sensors are not hand selected; Sold as is. No Returns.

FLX-01-OOS - \$2.00

Out of Spec Bi-Directional Bend Sensor

Enter Quantity: 1

Back to Top

Add to cart

http://www.imagesco.com/sensors/flex-sensor.html

Catalog Request | Shipping Policy | Return Policy | Contact Us

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