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Document Filed Electronically

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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|-----------------------------|---|------------------|
| STANDARD TEXTILE CO., INC., | : | |
| | : | Civil Action No. |
| Plaintiff, | : | |
| | : | |
| v. | : | |
| | : | |
| SOBEL WESTEX and | : | |
| SOBEL WESTEX, INC., | : | |
| | : | |
| Defendants. | x | |

COMPLAINT AND DEMAND FOR TRIAL BY JURY

Plaintiff Standard Textile Co., Inc., by its attorneys, for its complaint, alleges as follows:

THE PARTIES

1. Plaintiff Standard Textile Co., Inc. ("Standard Textile") is an Alabama corporation having a principal place of business at One Knollcrest Drive, Cincinnati, Ohio 45237.

2. On information and belief, defendant Sobel Westex is a Nevada corporation having its principal place of business at 2670 S. Western Avenue, Las Vegas, Nevada 89109, and does substantial and continuous business in the State of New Jersey, including through sales of the products accused to infringe the patent as set out below.

3. On information and belief, defendant Sobel Westex, Inc. is a branch or subsidiary of Sobel Westex, or is otherwise under the complete control of Sobel Westex, and has a place of business at 510 W Leeds Avenue, Pleasantville, New Jersey 08232, and does substantial and continuous business in the State of New Jersey, including through sales of the products accused to infringe the patent as set out below. Sobel Westex and Sobel Westex, Inc. are hereinafter referred to collectively as "Sobel."

JURISDICTION

4. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code. Federal question jurisdiction is conferred pursuant to U.S.C. §§ 1331 and 1338(a).

CLAIM FOR RELIEF

Infringement Of United States Patent No. 5,495,874

5. The allegations of paragraphs 1-4 are incorporated by reference as though fully set forth herein.

6. On March 5, 1996, United States Patent No. 5,495,874, entitled "Woven Fabric Sheeting" was duly and legally issued to Standard Textile (hereinafter "the '874 Patent"), and since that date Standard Textile has been the owner of the '874 Patent. A copy of the '874 Patent is attached hereto as Exhibit 1.

7. During all relevant times, Standard Textile has marked the products that have been manufactured under the '874 Patent in accordance with 35 U.S.C. § 287.

8. On information and belief, Sobel has infringed, and currently is infringing, one or more claims of the '874 Patent through the offer for sale, sale and importation into the United States of certain sheets and/or pillowcases, including sheets and/or pillow cases sold by Sobel under the name "Dolce Note."

9. On information and belief, the acts of infringement complained of herein are being carried out willfully and with full knowledge by Sobel of the '874 Patent.

10. As a result of the actions of Sobel, Standard Textile has suffered, and continues to suffer, substantial injury, including irreparable injury, and Standard Textile has been damaged and will continue to be damaged, including through the loss of sales and profits that Standard Textile would have made but for the infringement by Sobel, unless Sobel is enjoined by this Court.

WHEREFORE, Standard Textile prays:

A. That this Court enter a decree holding that Sobel Westex and Sobel Westex, Inc. have infringed United States Patent No. 5,495,874.

B. That Sobel Westex and Sobel Westex, Inc., and their agents, employees, successors and assigns, and any and all persons or entities acting at, through, under or in active concert or participation with or under authority of or from them, be enjoined and restrained, preliminarily during the course of this proceeding and thereafter permanently, from making, using, offering for sale, selling and/or importing into the United States any product that infringes United States Patent No. 5,495,874.

C. That Sobel Westex and Sobel Westex, Inc. be directed to destroy all products in its inventory that have been found to infringe United States Patent No. 5,495,874.

D. That Sobel Westex and Sobel Westex, Inc. be directed to recall all products that have been sold that infringe United States Patent No. 5,495,874.

E. That Sobel Westex and Sobel Westex, Inc. be directed to notify all entities to whom they have sold any product that has been found to infringe United States Patent No. 5,495,874 of the judgment entered in this action and that the product sold to such entity is an infringement of United States Patent No. 5,495,874.

F. That a judgment be entered that Sobel Westex and Sobel Westex, Inc. be required to pay over to Standard Textile all damages sustained by Standard Textile due to the acts of infringement complained of herein, and that such damages be trebled pursuant to 35 U.S.C. § 284 for the willful acts of infringement complained of herein.

G. That this is an exceptional and willful case and that Standard Textile be awarded the cost of this action and reasonable attorney fees pursuant to 35 U.S.C. § 285.

H. That Sobel Westex and Sobel Westex, Inc. be ordered to file with this court and serve on Standard Textile within thirty (30) days after entry of final judgment of this cause a report in writing under oath setting forth in detail the manner and form in which Sobel Westex and Sobel Westex, Inc. have complied with the final judgment.

I. For such other and further relief as the nature of the case may require and as may be deemed just and equitable.

DEMAND FOR TRIAL BY JURY

Plaintiff Standard Textile Co., Inc. hereby demands and request trial by jury of all issues that are triable by jury.

Respectfully submitted,

LERNER, DAVID, LITTENBERG,
KRUMHOLZ & MENTLIK, LLP
Attorneys for Plaintiff Standard Textile Co., Inc.

Dated: February 23, 2009

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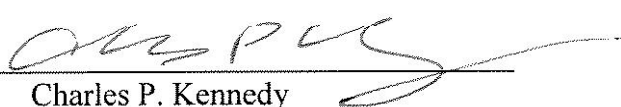
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CERTIFICATION PURSUANT TO LOCAL CIVIL RULE 11.2

The undersigned hereby certifies, pursuant to Local Civil Rule 11.2, that with respect to the matter in controversy herein, neither plaintiff nor plaintiff's attorney is aware of any other action pending in any court, or of any pending arbitration or administrative proceeding, to which this matter is subject.

Dated: February 23, 2009

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