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UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, Plaintiff v. THE BLACK & DECKER CORPORATION; BLACK & DECKER, INC.; BLACK & DECKER (US), INC.; PORTER-CABLE CORPORATION; VECTOR PRODUCTS, INC.; PHILLIPS PLASTICS CORPORATION; HI-TECH PLASTICS INC.; B&D HOLDINGS, LLC; AND DOES 1 THROUGH 1000, Defendants.	Case No. 06-CV-1572 BTM (CAB) **FIRST AMENDED COMPLAINT FOR PATENT INFRINGEMENT FILED PURSUANT TO COURT ORDER ENTERED FEBRUARY 27, 2007** REQUEST FOR JURY TRIAL

Plaintiff JENS E. SORENSEN, as TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST ("SRDT"), for its Complaint for Patent Infringement against Defendants, alleges as follows:

THE PARTIES

1. SRDT is a California resident, and the trustee of a trust organized according to California law, and is the owner of United States Patent Number 4,935,184 with all rights to license and enforce this patent subject to the rights of existing use licensees. SRDT's right to enforce United States Patent Number 4,935,184 includes the right to bring lawsuits against parties that infringe the patent.

2A. Defendant THE BLACK & DECKER CORPORATION ("BDC") is a corporation organized under the laws of Maryland, having a principal office located at 701 East Joppa Road, Towson, Maryland, is directly and through its subsidiaries, including, though not limited to those listed below, engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of a wide variety of tools, appliances and other equipment, including some or all of the Accused Products herein.

2B. On information and belief, Defendant B&D HOLDINGS, LLC ("BDH") is a direct or indirect corporate subsidiary of BDC and upon information and belief, is directly and through its subsidiaries, engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of a wide variety of tools, appliances and other equipment, including some or all of the Accused Products herein. BDH was named Black & Decker Holdings, LLC at the time of filing of this lawsuit.

2C. On information and belief, Defendant BLACK & DECKER, INC. ("BDINC") is a direct or indirect corporate subsidiary of THE BLACK & DECKER CORPORATION, and upon information and belief, is directly and through its subsidiaries, engaged in the manufacture, import, sale, and/or offer for sale within

the United States, including this District, of a wide variety of tools, appliances and other equipment, including some or all of the Accused Products herein.

2D. On information and belief, Defendant BLACK & DECKER (U.S.) INC. ("BDUS") is a direct or indirect corporate subsidiary of BDC, and conducts some of its business under the tradenames "DeWalt" and "DeWalt Industrial Tool Company," and upon information and belief, is directly and through its subsidiaries, engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of a wide variety of tools, appliances and other equipment, including some or all of the Accused Products herein.

2E. On information and belief, Defendant PORTER-CABLE CORPORATION ("PORTER") at times relevant from and after August 7, 2000 was a corporation, directly and through its subsidiaries, engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of a wide variety of tools, appliances and other equipment, including some or all of the Accused Products herein. On information and belief, Defendant PORTER is now a direct or indirect corporate subsidiary of BDC, form unknown, or has merged into a direct or indirect corporate subsidiary of BDC, possibly ending its independent existence.

2F. On information and belief, Defendant VECTOR PRODUCTS, INC. ("VECTOR") is a direct or indirect corporate subsidiary of, and upon information and belief, is directly and through its subsidiaries, engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of a wide variety of tools, appliances and other equipment, including some or all of the Accused Products herein.

2G. On information and belief, Defendant PHILLIPS PLASTICS CORPORATION ("PHILLIPS") is a corporation having principal offices located at 1201 Hanley Road, Hudson, Wisconsin; Seven Long Lake Drive, Phillips, Wisconsin; and at 3449 Sky Park Blvd., Eau Claire, Wisconsin. On information and

belief, PHILLIPS is engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of certain of the Accused Products identified herein.

2H. On information and belief, Defendant HI-TECH PLASTICS INC. ("HI-TECH") is a corporation having principal offices located at 822 Chesapeake Drive, Cambridge, Maryland; and at Mission, Texas. On information and belief, HI-TECH is engaged in the manufacture, import, sale, and/or offer for sale within the United States, including this District, of certain of the Accused Products identified herein.

2I. On information and belief, Defendants DOES 1 through 1000, inclusive, are direct or indirect corporate subsidiaries of THE BLACK & DECKER CORPORATION, or are suppliers, manufacturers, importers, or sellers of one or more of the Accused Products identified herein.

2J. On information and belief, THE BLACK & DECKER CORPORATION; BLACK & DECKER, INC.; BLACK & DECKER (U.S.), INC.; PORTER-CABLE CORPORATION; VECTOR PRODUCTS, INC.; PHILLIPS PLASTICS CORPORATION; HI-TECH PLASTICS INC.; B&D HOLDINGS, LLC and DOES 1 through 1000, inclusive, are collectively and individually, each involved in the manufacture, import, sale, and or offer for sale within the United States, including this District, of a wide variety of tools, appliances and other equipment, including the Accused Products identified herein.

2K. Defendants BDC, BDINC, BDUS, PORTER, VECTOR, and DOES 1-500, are referred to collectively herein as "B&D DEFENDANTS." Defendants PHILLIPS, HI-TECH, and DOES 501-1000, are referred to collectively herein as "SUPPLIER DEFENDANTS." Otherwise, references herein to "DEFENDANTS" refer to all Defendants.

JURISDICTION and VENUE

3. This action arises under the Patent Laws of the United States of America, Title 35, United States Code. Jurisdiction is founded on Title 28, United

States Code §§ 1331, 1332(a), and 1338(a).

4. On information and belief, venue in this district is proper under 28 U.S.C. §§ 1391 and 1400(b) because Defendants have committed acts of direct infringement, contribution to infringement, and/or inducement of infringement within the District.

5. This Court has personal jurisdiction over B&D DEFENDANTS under the long-arm statute of California and U.S. constitutional law because B&D DEFENDANTS ship its products into the Southern District of California, offers those products for sale and sells those products in this district directly and via the internet, provides advertising in this district targeted to this district's residents, and maintains a network of authorized distribution arrangements with retailers in this district for the purpose of selling DEFENDANTS products.

5A. This Court has personal jurisdiction over SUPPLIER DEFENDANTS under the long-arm statute of California and U.S. constitutional law because SUPPLIER DEFENDANTS are suppliers of products to B&D DEFENDANTS and thereby inject their products into the stream of commerce by selling them to one or more B&D DEFENDANTS, being fully aware that they are distributed throughout the United States.

6. Ole Sorensen, the inventor of the United States Patent No. 4,935,184 ("the '184 patent"), is an inventor who has spent a lifetime making improved plastic products and solving problems in the manufacture of plastic products including product weight reduction and reduced production time and various strength and quality enhancements.

7. Ole Sorensen's experience and efforts over the last four decades in the plastics industry have resulted in more than 65 United States Patents, many of which have been recognized worldwide. His ideas and work have resulted in improved products and manufacturing processes for plastic flowerpots, plastic medical devices, tape cassette cases, cable ties, educational toys, food and beverage containers and

other plastic products.

8. The ‘184 patent entitled "Stabilized Injection Molding When Using a Common Mold Part With Separate Complimentary Mold Parts," was issued on June 19, 1990. The ‘184 patent is one of Ole Sorensen’s globally recognized patents, having also been granted in Japan and Europe.

9. The ‘184 patent provides a long-sought elegant solution to a pervasive problem in the injection molding of hollow plastic products: i.e., how to stabilize the mold parts against relative movement during the highly pressurized injection of melted plastic.

10. This mold part relative movement problem causes misalignment of the mold parts and results in products with walls of uneven thicknesses if not adequately controlled.

11. Ole Sorensen has been awarded several patents for his invention of multiple methods for mold part stabilization that are applicable in different injection molding situations.

12. The ‘184 patented method is directed toward stabilizing the mold parts against relative movement during the second injection of injection molding of laminated plastic parts produced sequentially in two cavities made up of at least one common mold part and at least two different complementary mold parts.

13. The ‘184 patent teaches a method to stabilize the mold parts during a plastic injection by molding one or more stabilizing regions into the mold cavity of an earlier injection that rigidly secure the two mold parts against displacement during the later injection.

14. By stabilizing the mold parts against mold part relative movement during the injection process, hollow products may be produced having improved control of dimensions.

15. DEFENDANTS have not obtained a license or any other valid authorization for import, sale, or offer for sale in the United States of products

manufactured through use of the '184 patented process.

CLAIM FOR RELIEF

(Patent Infringement)

16. SRDT realleges and incorporates herein by reference paragraphs 1 through 15, inclusive, as though fully set forth herein.

17. On information and belief, DEFENDANTS have in the past and do presently make, import into, sell or offer for sale within the United States and this District, products for which the two plastic component external plastic shells are manufactured through processes which incorporate all elements of the '184 patented process. Those products identified in the following table and any other of DEFENDANTS' products sold under any name which are manufactured utilizing similar processes, including but not limited to, any other product manufactured using the same injection mold as any of the products identified in the following table, are collectively referred to herein as "Accused Products":

PRODUCT NAME	**PRODUCT NO.**
HUSKY Rechargeable Tough Brite Lantern	148 530
Porter Cable 7.25" Quick Change Blade-Right Mag Saw	423MAG
	9089K
Tiger Saw	9750
	AD600
B&D Autotape	ATM100
	BDBN1202
	BDBN1202
	BDC752K
	BDG1200K
	BDG14SF-2
	BDID1202
B&D Laser Level and Stud Finder	BDL100S
B&D Cordless Finish Nailer	BN1200
B&D 12V Cordless Drill	CD1200K

	CD1200SK
Pivot Rechargeable Drill/Driver	CD120GK
B&D 12 Volt Cordless Drill/Driver	CD120GR
	CD12SFK
B&D 14.4 Volt Cordless Drill/Driver	CD140G
	CD140GKR
	CD142SK
B&D 14.4 Volt Cordless Drill	CD1440K
B&D 14.4 Volt Gel Drill w/Studfinder/Flashlight	CD14GSF
	CD14SFK
B&D 18 Volt Cordless Drill	CD1800K
	CD182K-2
B&D 9.6 Volt Cordless Drill	CD9600K
	CD9602K
	CDC1200K
	CDC140AK
	CDC1440K
	CDC180AK
Hedge Hog 14.4 Volt Cordless Hedge Trimmer	CHT500
Black & Decker 10" 12V Cordless Trimmer/Edger	CST1200
DeWalt 1” SDS Rotary Hammer Drill	D25103
	DC300K
	DC305K
	DC308K
Cordless Jig Saw	DC330
DeWalt 18 Volt XRP Variable Speed Jig Saw	DC330K
DeWalt Reciprocating Saw, Type 2 ONLY	DC385
DeWalt Reciprocating Saw, Type 2 ONLY	DC385K
DeWalt 18 Volt Cordless Angle Grinder	DC410KA
	DC520KA
DeWalt 18 Volt Cordless Cut-Out Tool	DC550K
	DC612KA
	DC614KA
	DC616KA
DeWalt HD XRP 20 deg Angled Finish Nailer	DC618KA
	DC628KA
Cordless Drill/Driver	DC727
DeWalt 12 Volt Compact Drill/Driver	DC727KA

	DC727VA
DeWalt 14.4 Volt Compact Drill/Driver	DC728KA
Cordless Drill/Driver	DC750
	DC750KA
DeWalt 18 Volt Compact Drill/Driver	DC759KA
	DC800KL
1/2" Hammer Drill/Drill/Driver	DC900
	DC900KL
Cordless Drill	DC920
	DC920KA
1/2" Hammer Drill/Drill/Driver	DC925
	DC925KA
	DC925VA
DeWalt 18V XRP Cordless Drill/Driver/Hammer Drill	DC926
	DC926KA
	DC926VA
DeWalt 14.4V Cordless Drill/Driver	DC930
	DC930KA
DeWalt Reciprocating Saw, Type 2 ONLY	DC935KA
	DC936KA
	DC936VA
DeWalt 12V Cordless Drill/Driver	DC940
	DC940KA
DeWalt 12 Volt XRP Compact Drill/Driver	DC980KA
DeWalt 14.4 Volt XRP Drill/Driver	DC983KA
	DC983VA
	DC984KA
	DC984VA
	DC985KA
	DC985VA
DeWalt 18 Volt XRP Drill/Driver	DC987KA
	DC987VA
DeWalt 18 Volt XRP Hammer Drill/Drill/Driver	DC988
	DC988KA
	DC988VA
DeWalt 18 Volt XRP Hammer Drill/Driver	DC989KA
	DC989VA

DeWalt 18 Volt XRP Hammer Drill	DC998CA
DeWalt HD XRP ½" 12 Volt Drill/Driver	DCDCP1
DeWalt HD 3/8" 12 Volt Drill/Driver	DCDK12
	DR201
B&D 3/8" Variable Speed Drill	DR202
Black & Decker 3/8" VSR Drill/Driver with Clutch	DR203K
B&D 3/8" VSR Drill/Driver	DR220K
Black & Decker 5.2A 3/8" VSR Drill/Driver	DR250C
	DR501
B&D 1/2" VSR Drill/Driver	DR501K
B&D ½" VSR Hammer Drill	DR601
DeWalt 24 Volt ½" Cordless Hammer Drill	DW006K-2
	DW007K-2
Reciprocating Saw	DW008
	DW008K-2
DeWalt 9.6 Volt Cordless Impact Driver	DW050K-2
DeWalt 12 Volt Cordless Impact Wrench Kit	DW051
	DW051K-2
DeWalt 12 Volt Cordless Impact Driver	DW052
DeWalt 12 Volt Cordless Impact Driver	DW052K-2
	DW053K-2
DeWalt 14.4 Volt Impact Driver	DW054K
	DW054K-2
	DW055K-2
DeWalt 18 Volt Impact Driver	DW056K2
	DW057K-2
Impact Wrench	DW059
	DW059K-2
DeWalt HD ½" Impact Wrench	DW292K
DeWalt Heavy Duty Reciprocating Saw Kit	DW309K
DeWalt Heavy Duty Jigsaw Kit	DW321K
DeWalt HD Variable Speed Top Handle Jig Saw	DW331
DeWalt 3" x 2" Belt Sander	DW432
DeWalt Heavy Duty Cutout Tool	DW660SK
DeWalt Heavy Duty 18 Volt Cordless Jig Saw	DW933K
DeWalt 14.4 Volt Cordless Swivel Head Shear	DW941K-2
	DW968K-2
	DW969K-2

DeWalt 12 Volt Cordless Drill with ¼" Hex-Drive	DW970
Drywall/Deck Screwdriver	DW979
	DW979K-2
DeWalt 12 Volt Cordless Drill/Driver	DW980K-2
DeWalt Heavy Duty 14.4 Volt Cordless Drill Kit	DW983K-2
DeWalt 14.4 Volt Cordless Hammer Drill	DW984K-2
DeWalt 14.4 Volt Cordless Drill/Driver Hammer Drill Kit	DW985K-2
DeWalt Heavy Duty 18 Volt Cordless Drill Kit	DW987K-2
DeWalt 18 Volt Cordless Hammer Drill/Driver	DW988K-2
DeWalt Heavy Duty 18 Volt Cordless Hammer Drill Kit	DW989K-2
Firestorm 12 Volt Cordless Hammer Drill	FS1200D
Firestorm12 Volt Hi Performance Drill	FS1202D
	FS1400D-2
Firestorm 18 Volt Circular Saw	FS1800CS
Firestorm 18 Volt 3/8" 2 Speed Cordless Drill	FS1800D
Firestorm 18 Volt Circular Saw	FS18CS
Firestorm 18 Volt Jig Saw	FS1800JS
Firestorm 18 Volt Reciprocating Saw	FS1800RS
	FS1802BN
Firestorm 18 Volt Hi Performance Drill	FS1802D
Firestorm 18 Volt Sander	FS1802S
Firestorm 18 Volt Circular Saw	FS1806CSL
	FS181D
Firestorm 24 Volt Circular Saw	FS2400CS
Firestorm 24 Volt Cordless Hammer Drill	FS2400D
Firestorm 24 Volt Reciprocating Saw	FS2400RS
Firestorm 24 Volt Hi Performance Drill/Hammer	FS2402D
Firestorm Drill 5 Amp 3/8" Chuck	FS5000FD
B&D ¼ Sheet Finishing Sander	FS540
B&D ¼ Sheet Sander	FS600G
B&D ¼ Sheet Sander	FS600G
Firestorm 4 ½" Angle Grinder	FS6500AG
Firestorm Reciprocating Saw	FS8500RS
B&D Corded Drill Kit	FSD122K-2
B&D Corded Drill Kit	FSD142K-2
B&D Corded Drill Kit	FSD182K-2

	FSX18HD
Black & Decker 14" 7.2Amp. Grass Hog Electric Trimmer/Edger	GH1000
Grass Hog 14” 5.0A Trimmer/Edger	GH600
Hedge Hog 24” Electric Hedge Trimmer	HH2450
12V Drill/Driver	HPD12
	HPD12K-2
	HPD14K-2
	HPD18K-2
B&D 18 Volt Gelmax Drill	HPG18K-2
Black & Decker 24" Electric Hedge Trimmer	HS2400
Hedge Hog 22” Electric Hedge Trimmer	HT2200 (corrected number)
B&D Jigsaw	JS350B
B&D Variable Speed Jig Saw	JS500K
B&D Jigsaw	JS600B
B&D 4.5A Orbital Jig Saw	JS600K
BullsEye Stud Finder w/Stud Sensor	L110S
BullsEye Auto Leveling Laser w/Stud Sensor	L1905
BullsEye Crosshair Auto Leveling Laser	L400S
B&D Smart Driver Rechargeable Screwdriver	Li3000
Cyclone 4 in 1 Sander	MS1000
B&D Mouse Sander/Polisher	MS550GB
B&D Multi Tool	MT1203B
B&D Multi Tool	MT1405B
Hedge Hog Trimmer	NHT518
Cordless Broom	NS118
Black & Decker 12" Cordless Grass Hog Trimmer/Edger	NST2018
Porter Cable Tiger Saw – Var. Spd. Reciprocating Saw	PC 747
Pivot Plus 3.6 Volt Drill/Screwdriver	PD36
Pivot Driver	PD360
Pivot Plus 6 Volt Drill Driver	PD600
Pivot Plus Drill/Driver	PD700G
B&D Powered Handsaw w/Gelmax	PHS550G
	PS12HAK
	PS7240K
Black & Decker 12.5V 1/4 Sheet Finish Sander	QS780

B&D 5" Random Orbital Sander	RO400G
RTX 3 Speed Rotary Tool	RTX-6
RTX High Performance Rotary Tool	RTX-B
B&D Sander	S1802G
Scum Buster Cordless Power Scrubber	S600
B&D Jigsaw	SC500
B&D Navigator Hand Saw	SC500G
Shear/Shrubber	SSC1000
B&D 2.6A Hedge Trimmer	TR2200
	XD1200K

18. One or more of the DEFENDANTS offer for sale or sell each of these Accused Products within the United States. The Accused Products bear one or more of the various Black & Decker brand names and trademarks either directly on the product and/or the packaging for the same.

19. [RESERVED]

20. Upon information and belief, B&D DEFENDANTS control the nature and quality of products sold under the various B&D trademarks and brand names, including the Accused Products, and manufactures these products in accordance with its design and product specifications.

21. DEFENDANTS possess or can obtain the manufacturing process information for the products sold under the B&D trademark, including the Accused Products.

22. DEFENDANTS have been on constructive notice of the '184 patent since its issuance on June 19, 1990.

23. By counsel's letter of January 23, 2004, SRDT placed B&D DEFENDANTS on actual notice of the '184 patent.

24. [RESERVED]

25. SRDT's counsel's letter of January 23, 2004 provided B&D DEFENDANTS with Drawing Numbers D-5373 and D-5375 and associated claim

charts showing the substantial likelihood pursuant to 35 U.S.C. § 295, of the infringement of the '184 patented process by the import, sale and/or offer for sale in this District and the United States of the identified Accused Products and all other Black & Decker products manufactured with processes which incorporate the elements of the '184 patent.

26. The evidence provided to B&D DEFENDANTS in the letter of January 23, 2004, including the drawings and related claim charts, illustrate how the processes utilized to produce the Accused Products incorporated each element of Claim 1 of the '184 patent. On information and belief, some or all of the Accused Products are manufactured utilizing processes that infringe Claims 1, 6, 7, 8, and 10 of the '184 patent.

27. The letter of January 23, 2004, included the results of expert analysis of the apparent injection molding process used to make the Accused Products.

28. The letter of January 23, 2004, also provided B&D DEFENDANTS with a copy of the '184 patent.

29. As of the date of filing of this First Amended Complaint, SRDT has discovered more than two hundred (200) Black & Decker products for which, on information and belief, there is a substantial likelihood pursuant to 35 U.S.C. § 295, of the infringement of the '184 patented process by the import, sale and/or offer for sale in this District and the United States and identified by name and product number in the table included within paragraph 17 hereinabove.

30. B&D DEFENDANTS have been advised of the identity of the Accused Products and have not produced evidence demonstrating that any of the Accused Products are not fabricated utilizing a process that infringes the '184 patent.

31. The Accused two plastic component external plastic shells of the DeWalt 24V Cordless 1/2" Inch Drill Hammers ("DW006") are plastic products.

32. The Accused external plastic shells of the DW006 are thin-walled products.

33. The Accused External plastic shells of the DW006 are hollow products.

34. The Accused External plastic shells of the DW006 are concave.

35. Some portions of the walls of the Accused External plastic shells of the DW006 are less than 5.0 mm in thickness.

36. On information and belief, The Accused External plastic shells of the DW006 are produced by cyclic injection molding.

37. The Accused External plastic shells of the DW006 have a closed end in accordance with the '184 patent.

38. The Accused External plastic shells of the DW006 have an open end in accordance with the '184 patent.

39. The Accused External plastic shells of the DW006 have laminated walls in accordance with the '184 patent.

40. The laminated walls of each of the Accused External plastic shells of the DW006 terminate in a rim at an open end in accordance with the '184 patent.

41. The Accused External plastic shells of the DW006 are molded utilizing a first mold cavity and a second mold cavity.

42. On information and belief, the first mold cavity utilized to mold each of the Accused External plastic shells of the DW006 is formed of at least one first common mold part and at least one first complementary mold part.

43. On information and belief, the second mold cavity utilized to mold each of the Accused External plastic shells of the DW006 is formed of at least one first common mold part and at least one second complementary mold part.

44. On information and belief, the steps described in the following paragraphs 45 through 55, inclusive, are followed in production of each of the Accused External plastic shells of the DW006:

45. On information and belief, the first common mold part and the first complementary mold part are combined to assemble the first mold cavity in production of the Accused External plastic shells of the DW006.

46. On information and belief, a first plastic material is injected into the first mold cavity in production of the Accused External plastic shells of the DW006.

47. On information and belief, the injected first plastic material is solidified to form a first plastic material component in production of the Accused External plastic shells of the DW006.

48. On information and belief, the first common mold part and the second complementary mold part are combined to assemble the second mold cavity in production of the Accused External plastic shells of the DW006, with the first plastic material component attached to the first common mold part during assembly of the second mold cavity. The first plastic material component is then contained within the second mold cavity.

49. On information and belief, a second plastic material having different characteristics than the first plastic material is injected into the second mold cavity in production of the Accused External plastic shells of the DW006.

50. On information and belief, after the second plastic material is injected, it solidifies to form a second plastic material component that fuses with the first plastic material component to produce the Accused External plastic shells of the DW006.

51. On information and belief, the first plastic material component has one or more stabilizing regions in accordance with the '184 patent.

52. On information and belief, the stabilizing regions in the first plastic material component rigidly secure the first common mold part, in position in relation to the second complementary mold part in production of the Accused External plastic shells of the DW006.

53. On information and belief, the stabilizing regions of the first plastic material component restrict displacement of the first common mold part in relation to the second complementary mold part that would otherwise result from the injection pressure of the second plastic material during injection into the second mold cavity in production of the Accused External plastic shells of the DW006.

54. On information and belief, the stabilization during the injection of the second plastic material allows the Accused External plastic shells of the DW006, to be produced with improved control of dimensions.

55. On information and belief, The first plastic material of the Accused Products reaches the rim of the Accused External plastic shells of the DW006 in accordance with the '184 patent.

56. On information and belief, The second plastic material of the Accused External plastic shells of the DW006 reaches the rim of the Accused Products.

57. On information and belief, the Accused External plastic shells of the product number ATM100 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

58. On information and belief, the process used to manufacture the Accused External plastic shells of the product number ATM100 Products incorporates a common mold part during the injections of both the first and second plastic material components.

59. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number ATM100 Products extends to the product rim.

60. On information and belief, the Accused External plastic shells of the product number BN1200 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

61. On information and belief, the process used to manufacture the Accused External plastic shells of the product number BN1200 Products incorporates a common mold part during the injections of both the first and second plastic material components.

62. On information and belief, both the first plastic material component and

the second plastic material component of the Accused External plastic shells of the product number BN1200 Products extends to the product rim.

63. On information and belief, the Accused External plastic shells of the product number CD1200K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

64. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD1200K Products incorporates a common mold part during the injections of both the first and second plastic material components.

65. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD1200K Products extends to the product rim.

66. On information and belief, the Accused External plastic shells of the product number DR202 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

67. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DR202 Products incorporates a common mold part during the injections of both the first and second plastic material components.

68. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DR202 Products extends to the product rim.

69. On information and belief, the Accused External plastic shells of the product number DR601 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

70. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DR601 Products incorporates a common mold part during the injections of both the first and second plastic material components.

71. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DR601 Products extends to the product rim.

72. On information and belief, the Accused External plastic shells of the product number JS600B Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

73. On information and belief, the process used to manufacture the Accused External plastic shells of the product number JS600B Products incorporates a common mold part during the injections of both the first and second plastic material components.

74. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number JS600B Products extends to the product rim.

75. On information and belief, the Accused External plastic shells of the product number FS540 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

76. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS540 Products incorporates a common mold part during the injections of both the first and second plastic material components.

77. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the

product number FS540 Products extends to the product rim.

78. On information and belief, the Accused External plastic shells of the product number Li3000 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

79. On information and belief, the process used to manufacture the Accused External plastic shells of the product number Li3000 Products incorporates a common mold part during the injections of both the first and second plastic material components.

80. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number Li3000 Products extends to the product rim.

81. On information and belief, the Accused External plastic shells of the product number RO400G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

82. On information and belief, the process used to manufacture the Accused External plastic shells of the product number RO400G Products incorporates a common mold part during the injections of both the first and second plastic material components.

83. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number RO400G Products extends to the product rim.

84. On information and belief, the Accused External plastic shells of the product number SC500G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

85. On information and belief, the process used to manufacture the Accused

External plastic shells of the product number SC500G Products incorporates a common mold part during the injections of both the first and second plastic material components.

86. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number SC500G Products extends to the product rim.

87. On information and belief, the Accused External plastic shells of the product number JS600K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

88. On information and belief, the process used to manufacture the Accused External plastic shells of the product number JS600K Products incorporates a common mold part during the injections of both the first and second plastic material components.

89. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number JS600K Products extends to the product rim.

90. On information and belief, the Accused External plastic shells of the product number FS600G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

91. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS600G Products incorporates a common mold part during the injections of both the first and second plastic material components.

92. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS600G Products extends to the product rim.

93. On information and belief, the Accused External plastic shells of the product number S1802G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

94. On information and belief, the process used to manufacture the Accused External plastic shells of the product number S1802G Products incorporates a common mold part during the injections of both the first and second plastic material components.

95. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number S1802G Products extends to the product rim.

96. On information and belief, the Accused External plastic shells of the product number JS500K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

97. On information and belief, the process used to manufacture the Accused External plastic shells of the product number JS500K Products incorporates a common mold part during the injections of both the first and second plastic material components.

98. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number JS500K Products extends to the product rim.

99. On information and belief, the Accused External plastic shells of the product number DR220K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

100. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DR220K Products incorporates a

common mold part during the injections of both the first and second plastic material components.

101. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DR220K Products extends to the product rim.

102. On information and belief, the Accused External plastic shells of the product number DR501K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

103. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DR501K Products incorporates a common mold part during the injections of both the first and second plastic material components.

104. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DR501K Products extends to the product rim.

105. On information and belief, the Accused External plastic shells of the product number CD120GR Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

106. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD120GR Products incorporates a common mold part during the injections of both the first and second plastic material components.

107. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD120GR Products extends to the product rim.

108. On information and belief, the Accused External plastic shells of the

product number CD140G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

109. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD140G Products incorporates a common mold part during the injections of both the first and second plastic material components.

110. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD140G Products extends to the product rim.

111. On information and belief, the Accused External plastic shells of the product number HPG18K-2Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

112. On information and belief, the process used to manufacture the Accused External plastic shells of the product number HPG18K-2Products incorporates a common mold part during the injections of both the first and second plastic material components.

113. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number HPG18K-2 Products extends to the product rim.

114. On information and belief, the Accused External plastic shells of the product number TR2200 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

115. On information and belief, the process used to manufacture the Accused External plastic shells of the product number TR2200 Products incorporates a common mold part during the injections of both the first and second plastic material

components.

116. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number TR2200 Products extends to the product rim.

117. On information and belief, the Accused External plastic shells of the product number BDL100S Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

118. On information and belief, the process used to manufacture the Accused External plastic shells of the product number BDL100S Products incorporates a common mold part during the injections of both the first and second plastic material components.

119. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number BDL100S Products extends to the product rim.

120. On information and belief, the Accused External plastic shells of the product number CD1200SK Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

121. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD1200SK Products incorporates a common mold part during the injections of both the first and second plastic material components.

122. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD1200SK Products extends to the product rim.

123. On information and belief, the Accused External plastic shells of the product number CD1440K Products is manufactured with a process including all

elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

124. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD1440K Products incorporates a common mold part during the injections of both the first and second plastic material components.

125. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD1440K Products extends to the product rim.

126. On information and belief, the Accused External plastic shells of the product number CD1800K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

127. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD1800K Products incorporates a common mold part during the injections of both the first and second plastic material components.

128. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD1800K Products extends to the product rim.

129. On information and belief, the Accused External plastic shells of the product number CD9600K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

130. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD9600K Products incorporates a common mold part during the injections of both the first and second plastic material components.

131. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD9600K Products extends to the product rim.

132. On information and belief, the Accused External plastic shells of the product number MT1203B Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

133. On information and belief, the process used to manufacture the Accused External plastic shells of the product number MT1203B Products incorporates a common mold part during the injections of both the first and second plastic material components.

134. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number MT1203B Products extends to the product rim.

135. On information and belief, the Accused External plastic shells of the product number MT1405B Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

136. On information and belief, the process used to manufacture the Accused External plastic shells of the product number MT1405B Products incorporates a common mold part during the injections of both the first and second plastic material components.

137. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number MT1405B Products extends to the product rim.

138. On information and belief, the Accused External plastic shells of the product number FSD122K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in

paragraphs 31 through 56, inclusive, hereinabove.

139. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FSD122K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

140. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FSD122K-2 Products extends to the product rim.

141. On information and belief, the Accused External plastic shells of the product number FSD142K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

142. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FSD142K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

143. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FSD142K-2 Products extends to the product rim.

144. On information and belief, the Accused External plastic shells of the product number FSD182K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

145. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FSD182K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

146. On information and belief, both the first plastic material component and

the second plastic material component of the Accused External plastic shells of the product number FSD182K-2 Products extends to the product rim.

147. On information and belief, the Accused External plastic shells of the product number SC500 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

148. On information and belief, the process used to manufacture the Accused External plastic shells of the product number SC500 Products incorporates a common mold part during the injections of both the first and second plastic material components.

149. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number SC500 Products extends to the product rim.

150. On information and belief, the Accused External plastic shells of the product number JS350B Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

151. On information and belief, the process used to manufacture the Accused External plastic shells of the product number JS350B Products incorporates a common mold part during the injections of both the first and second plastic material components.

152. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number JS350B Products extends to the product rim.

153. On information and belief, the Accused External plastic shells of the product number MS550GB Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

154. On information and belief, the process used to manufacture the Accused External plastic shells of the product number MS550GB Products incorporates a common mold part during the injections of both the first and second plastic material components.

155. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number MS550GB Products extends to the product rim.

156. On information and belief, the Accused External plastic shells of the product number CD14GSF Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

157. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD14GSF Products incorporates a common mold part during the injections of both the first and second plastic material components.

158. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD14GSF Products extends to the product rim.

159. On information and belief, the Accused External plastic shells of the product number PHS550G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

160. On information and belief, the process used to manufacture the Accused External plastic shells of the product number PHS550G Products incorporates a common mold part during the injections of both the first and second plastic material components.

161. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the

product number PHS550G Products extends to the product rim.

162. On information and belief, the Accused External plastic shells of the product number FS600G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

163. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS600G Products incorporates a common mold part during the injections of both the first and second plastic material components.

164. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS600G Products extends to the product rim.

165. On information and belief, the Accused External plastic shells of the product number L1905 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

166. On information and belief, the process used to manufacture the Accused External plastic shells of the product number L1905 Products incorporates a common mold part during the injections of both the first and second plastic material components.

167. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number L1905 Products extends to the product rim.

168. On information and belief, the Accused External plastic shells of the product number L400S Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

169. On information and belief, the process used to manufacture the Accused

External plastic shells of the product number L400S Products incorporates a common mold part during the injections of both the first and second plastic material components.

170. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number L400S Products extends to the product rim.

171. On information and belief, the Accused External plastic shells of the product number L110S Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

172. On information and belief, the process used to manufacture the Accused External plastic shells of the product number L110S Products incorporates a common mold part during the injections of both the first and second plastic material components.

173. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number L110S Products extends to the product rim.

174. On information and belief, the Accused External plastic shells of the product number RTX-B Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

175. On information and belief, the process used to manufacture the Accused External plastic shells of the product number RTX-B Products incorporates a common mold part during the injections of both the first and second plastic material components.

176. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number RTX-B Products extends to the product rim.

177. On information and belief, the Accused External plastic shells of the product number RTX-6 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

178. On information and belief, the process used to manufacture the Accused External plastic shells of the product number RTX-6 Products incorporates a common mold part during the injections of both the first and second plastic material components.

179. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number RTX-6 Products extends to the product rim.

180. On information and belief, the Accused External plastic shells of the product number PD36 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

181. On information and belief, the process used to manufacture the Accused External plastic shells of the product number PD36 Products incorporates a common mold part during the injections of both the first and second plastic material components.

182. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number PD36 Products extends to the product rim.

183. On information and belief, the Accused External plastic shells of the product number PD600 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

184. On information and belief, the process used to manufacture the Accused External plastic shells of the product number PD600 Products incorporates a

common mold part during the injections of both the first and second plastic material components.

185. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number PD600 Products extends to the product rim.

186. On information and belief, the Accused External plastic shells of the product number PD700G Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

187. On information and belief, the process used to manufacture the Accused External plastic shells of the product number PD700G Products incorporates a common mold part during the injections of both the first and second plastic material components.

188. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number PD700G Products extends to the product rim.

189. On information and belief, the Accused External plastic shells of the product number PD360Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

190. On information and belief, the process used to manufacture the Accused External plastic shells of the product number PD360 Products incorporates a common mold part during the injections of both the first and second plastic material components.

191. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number PD360 Products extends to the product rim.

192. On information and belief, the Accused External plastic shells of the

product number CD120GK Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

193. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CD120GK Products incorporates a common mold part during the injections of both the first and second plastic material components.

194. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CD120GK Products extends to the product rim.

195. On information and belief, the Accused External plastic shells of the product number MS1000 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

196. On information and belief, the process used to manufacture the Accused External plastic shells of the product number MS1000Products incorporates a common mold part during the injections of both the first and second plastic material components.

197. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number MS1000 Products extends to the product rim.

198. On information and belief, the Accused External plastic shells of the product number DW321K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

199. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW321K Products incorporates a common mold part during the injections of both the first and second plastic material

components.

200. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW321K Products extends to the product rim.

201. On information and belief, the Accused External plastic shells of the product number DW309K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

202. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW309K Products incorporates a common mold part during the injections of both the first and second plastic material components.

203. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW309K Products extends to the product rim.

204. On information and belief, the Accused External plastic shells of the product number DW983K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

205. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW983K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

206. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW983K-2 Products extends to the product rim.

207. On information and belief, the Accused External plastic shells of the product number DW987K-2 Products is manufactured with a process including all

elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

208. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW987K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

209. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW987K-2 Products extends to the product rim.

210. On information and belief, the Accused External plastic shells of the product number DW989K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

211. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW989K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

212. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW989K-2 Products extends to the product rim.

213. On information and belief, the Accused External plastic shells of the product number DC940 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

214. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC940 Products incorporates a common mold part during the injections of both the first and second plastic material components.

215. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC940 Products extends to the product rim.

216. On information and belief, the Accused External plastic shells of the product number DC936KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

217. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC936KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

218. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC936KA Products extends to the product rim.

219. On information and belief, the Accused External plastic shells of the product number DW980K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

220. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW980K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

221. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW980K-2 Products extends to the product rim.

222. On information and belief, the Accused External plastic shells of the product number DW970 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in

paragraphs 31 through 56, inclusive, hereinabove.

223. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW970 Products incorporates a common mold part during the injections of both the first and second plastic material components.

224. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW970 Products extends to the product rim.

225. On information and belief, the Accused External plastic shells of the product number DW006K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

226. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW006K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

227. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW006K-2 Products extends to the product rim.

228. On information and belief, the Accused External plastic shells of the product number DC727KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

229. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC727KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

230. On information and belief, both the first plastic material component and

the second plastic material component of the Accused External plastic shells of the product number DC727KA Products extends to the product rim.

231. On information and belief, the Accused External plastic shells of the product number DC980KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

232. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC980KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

233. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC980KA Products extends to the product rim.

234. On information and belief, the Accused External plastic shells of the product number DC728KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

235. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC728KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

236. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC728KA Products extends to the product rim.

237. On information and belief, the Accused External plastic shells of the product number DC759KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

238. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC759KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

239. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC759KA Products extends to the product rim.

240. On information and belief, the Accused External plastic shells of the product number DC983KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

241. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC983KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

242. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC983KA Products extends to the product rim.

243. On information and belief, the Accused External plastic shells of the product number DC987KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

244. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC987KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

245. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the

product number DC987KA Products extends to the product rim.

246. On information and belief, the Accused External plastic shells of the product number DC989KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

247. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC989KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

248. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC989KA Products extends to the product rim.

249. On information and belief, the Accused External plastic shells of the product number DW056K2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

250. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW056K2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

251. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW056K2 Products extends to the product rim.

252. On information and belief, the Accused External plastic shells of the product number DC988 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

253. On information and belief, the process used to manufacture the Accused

External plastic shells of the product number DC988 Products incorporates a common mold part during the injections of both the first and second plastic material components.

254. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC988 Products extends to the product rim.

255. On information and belief, the Accused External plastic shells of the product number DC300K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

256. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC300K Products incorporates a common mold part during the injections of both the first and second plastic material components.

257. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC300K Products extends to the product rim.

258. On information and belief, the Accused External plastic shells of the product number DW660SK Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

259. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW660SK Products incorporates a common mold part during the injections of both the first and second plastic material components.

260. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW660SK Products extends to the product rim.

261. On information and belief, the Accused External plastic shells of the product number DW933K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

262. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW933K Products incorporates a common mold part during the injections of both the first and second plastic material components.

263. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW933K Products extends to the product rim.

264. On information and belief, the Accused External plastic shells of the product number DW052K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

265. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW052K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

266. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW052K-2 Products extends to the product rim.

267. On information and belief, the Accused External plastic shells of the product number DW985K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

268. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW985K-2 Products incorporates a

common mold part during the injections of both the first and second plastic material components.

269. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW985K-2 Products extends to the product rim.

270. On information and belief, the Accused External plastic shells of the product number DC926 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

271. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC926 Products incorporates a common mold part during the injections of both the first and second plastic material components.

272. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC926 Products extends to the product rim.

273. On information and belief, the Accused External plastic shells of the product number DW051 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

274. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW051 Products incorporates a common mold part during the injections of both the first and second plastic material components.

275. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW051 Products extends to the product rim.

276. On information and belief, the Accused External plastic shells of the

product number DW941K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

277. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW941K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

278. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW941K-2 Products extends to the product rim.

279. On information and belief, the Accused External plastic shells of the product number DW050K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

280. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW050K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

281. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW050K-2 Products extends to the product rim.

282. On information and belief, the Accused External plastic shells of the product number DW984K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

283. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW984K-2 Products incorporates a common mold part during the injections of both the first and second plastic material

components.

284. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW984K-2 Products extends to the product rim.

285. On information and belief, the Accused External plastic shells of the product number DC930 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

286. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC930 Products incorporates a common mold part during the injections of both the first and second plastic material components.

287. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC930 Products extends to the product rim.

288. On information and belief, the Accused External plastic shells of the product number DW988K-2 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

289. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW988K-2 Products incorporates a common mold part during the injections of both the first and second plastic material components.

290. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW988K-2 Products extends to the product rim.

291. On information and belief, the Accused External plastic shells of the product number DC925 Products is manufactured with a process including all

elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

292. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC925 Products incorporates a common mold part during the injections of both the first and second plastic material components.

293. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC925 Products extends to the product rim.

294. On information and belief, the Accused External plastic shells of the product number DC920 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

295. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC920 Products incorporates a common mold part during the injections of both the first and second plastic material components.

296. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC920 Products extends to the product rim.

297. On information and belief, the Accused External plastic shells of the product number DC984KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

298. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC984KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

299. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC984KA Products extends to the product rim.

300. On information and belief, the Accused External plastic shells of the product number DC900 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

301. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC900 Products incorporates a common mold part during the injections of both the first and second plastic material components.

302. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC900 Products extends to the product rim.

303. On information and belief, the Accused External plastic shells of the product number DC800KLProducts is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

304. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC800KL Products incorporates a common mold part during the injections of both the first and second plastic material components.

305. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC800KL Products extends to the product rim.

306. On information and belief, the Accused External plastic shells of the product number DC750 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in

paragraphs 31 through 56, inclusive, hereinabove.

307. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC750 Products incorporates a common mold part during the injections of both the first and second plastic material components.

307. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC750 Products extends to the product rim.

308. On information and belief, the Accused External plastic shells of the product number DC628KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

309. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC628KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

310. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC628KA Products extends to the product rim.

311. On information and belief, the Accused External plastic shells of the product number DR501 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

312. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DR501 Products incorporates a common mold part during the injections of both the first and second plastic material components.

313. On information and belief, both the first plastic material component and

the second plastic material component of the Accused External plastic shells of the product number DR501 Products extends to the product rim.

314. On information and belief, the Accused External plastic shells of the product number D25103 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

315. On information and belief, the process used to manufacture the Accused External plastic shells of the product number D25103 Products incorporates a common mold part during the injections of both the first and second plastic material components.

316. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number D25103 Products extends to the product rim.

317. On information and belief, the Accused External plastic shells of the product number DC330K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

318. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC330K Products incorporates a common mold part during the injections of both the first and second plastic material components.

319. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC330K Products extends to the product rim.

320. On information and belief, the Accused External plastic shells of the product number DC410KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

321. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC410KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

322. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC410KA Products extends to the product rim.

323. On information and belief, the Accused External plastic shells of the product number DC550K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

324. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC550K Products incorporates a common mold part during the injections of both the first and second plastic material components.

325. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC550K Products extends to the product rim.

326. On information and belief, the Accused External plastic shells of the product number DC998CA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

327. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC998CA Products incorporates a common mold part during the injections of both the first and second plastic material components.

328. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the

product number DC998CA Products extends to the product rim.

329. On information and belief, the Accused External plastic shells of the product number DW054K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

330. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW054K Products incorporates a common mold part during the injections of both the first and second plastic material components.

331. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW054K Products extends to the product rim.

332. On information and belief, the Accused External plastic shells of the product number DC308K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

333. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC308K Products incorporates a common mold part during the injections of both the first and second plastic material components.

334. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC308K Products extends to the product rim.

335. On information and belief, the Accused External plastic shells of the product number DW331Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

336. On information and belief, the process used to manufacture the Accused

External plastic shells of the product number DW331 Products incorporates a common mold part during the injections of both the first and second plastic material components.

337. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW331 Products extends to the product rim.

338. On information and belief, the Accused External plastic shells of the product number DW292K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

339. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW292K Products incorporates a common mold part during the injections of both the first and second plastic material components.

340. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW292K Products extends to the product rim.

341. On information and belief, the Accused External plastic shells of the product number DC305K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

342. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC305K Products incorporates a common mold part during the injections of both the first and second plastic material components.

343. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC305K Products extends to the product rim.

344. On information and belief, the Accused External plastic shells of the product number DC385K Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

345. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC385K Products incorporates a common mold part during the injections of both the first and second plastic material components.

346. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC385K Products extends to the product rim.

347. On information and belief, the Accused External plastic shells of the product number DC612KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

348. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC612KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

349. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC612KA Products extends to the product rim.

350. On information and belief, the Accused External plastic shells of the product number DC618KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

351. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC618KA Products incorporates a

common mold part during the injections of both the first and second plastic material components.

352. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC618KA Products extends to the product rim.

353. On information and belief, the Accused External plastic shells of the product number DW052 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

354. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DW052 Products incorporates a common mold part during the injections of both the first and second plastic material components.

355. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DW052 Products extends to the product rim.

356. On information and belief, the Accused External plastic shells of the product number DR201 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

357. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DR201 Products incorporates a common mold part during the injections of both the first and second plastic material components.

358. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DR201 Products extends to the product rim.

359. On information and belief, the Accused External plastic shells of the

product number DCDCP1 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

360. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DCDCP1 Products incorporates a common mold part during the injections of both the first and second plastic material components.

361. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DCDCP1 Products extends to the product rim.

362. On information and belief, the Accused External plastic shells of the product number DCDK12 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

363. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DCDK12 Products incorporates a common mold part during the injections of both the first and second plastic material components.

364. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DCDK12 Products extends to the product rim.

365. On information and belief, the Accused External plastic shells of the product number HH2450 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

366. On information and belief, the process used to manufacture the Accused External plastic shells of the product number HH2450 Products incorporates a common mold part during the injections of both the first and second plastic material

components.

367. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number HH2450 Products extends to the product rim.

368. On information and belief, the Accused External plastic shells of the product number CHT500 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

369. On information and belief, the process used to manufacture the Accused External plastic shells of the product number CHT500 Products incorporates a common mold part during the injections of both the first and second plastic material components.

370. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number CHT500 Products extends to the product rim.

371. On information and belief, the Accused External plastic shells of the product number HT2200Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

372. On information and belief, the process used to manufacture the Accused External plastic shells of the product number HT2200Products incorporates a common mold part during the injections of both the first and second plastic material components.

373. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number HT2200 Products extends to the product rim.

374. On information and belief, the Accused External plastic shells of the product number GH600 Products is manufactured with a process including all

elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

375. On information and belief, the process used to manufacture the Accused External plastic shells of the product number GH600 Products incorporates a common mold part during the injections of both the first and second plastic material components.

376. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number GH600 Products extends to the product rim.

377. On information and belief, the Accused External plastic shells of the product number S600 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

378. On information and belief, the process used to manufacture the Accused External plastic shells of the product number S600 Products incorporates a common mold part during the injections of both the first and second plastic material components.

379. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number S600 Products extends to the product rim.

380. On information and belief, the Accused External plastic shells of the product number DC330 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

381. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC330 Products incorporates a common mold part during the injections of both the first and second plastic material components.

382. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC330 Products extends to the product rim.

383. On information and belief, the Accused External plastic shells of the product number FS2400D Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

384. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS2400D Products incorporates a common mold part during the injections of both the first and second plastic material components.

385. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS2400D Products extends to the product rim.

386. On information and belief, the Accused External plastic shells of the product number FS1800D Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

387. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1800D Products incorporates a common mold part during the injections of both the first and second plastic material components.

388. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS1800D Products extends to the product rim.

389. On information and belief, the Accused External plastic shells of the product number FS1200D Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in

paragraphs 31 through 56, inclusive, hereinabove.

390. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1200D Products incorporates a common mold part during the injections of both the first and second plastic material components.

391. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS1200D Products extends to the product rim.

392. On information and belief, the Accused External plastic shells of the product number FS1202D Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

393. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1202D Products incorporates a common mold part during the injections of both the first and second plastic material components.

394. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS1202D Products extends to the product rim.

395. On information and belief, the Accused External plastic shells of the product number FS1802D Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

396. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1802D Products incorporates a common mold part during the injections of both the first and second plastic material components.

397. On information and belief, both the first plastic material component and

the second plastic material component of the Accused External plastic shells of the product number FS1802D Products extends to the product rim.

398. On information and belief, the Accused External plastic shells of the product number FS2402D Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

399. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS2402D Products incorporates a common mold part during the injections of both the first and second plastic material components.

400. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS2402D Products extends to the product rim.

401. On information and belief, the Accused External plastic shells of the product number FS2400CS Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

402. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS2400CS Products incorporates a common mold part during the injections of both the first and second plastic material components.

403. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS2400CS Products extends to the product rim.

404. On information and belief, the Accused External plastic shells of the product number FS2400RS Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

405. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS2400RS Products incorporates a common mold part during the injections of both the first and second plastic material components.

406. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS2400RS Products extends to the product rim.

407. On information and belief, the Accused External plastic shells of the product number FS1800RS Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

408. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1800RS Products incorporates a common mold part during the injections of both the first and second plastic material components.

409. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS1800RS Products extends to the product rim.

410. On information and belief, the Accused External plastic shells of the product number FS1802S Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

411. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1802S Products incorporates a common mold part during the injections of both the first and second plastic material components.

412. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the

product number FS1802S Products extends to the product rim.

413. On information and belief, the Accused External plastic shells of the product number DC985KA Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

414. On information and belief, the process used to manufacture the Accused External plastic shells of the product number DC985KA Products incorporates a common mold part during the injections of both the first and second plastic material components.

415. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number DC985KA Products extends to the product rim.

416. On information and belief, the Accused External plastic shells of the product number FS1800CS Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

417. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS1800CS Products incorporates a common mold part during the injections of both the first and second plastic material components.

418. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS1800CS Products extends to the product rim.

419. On information and belief, the Accused External plastic shells of the product number FS1800JS Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

420. On information and belief, the process used to manufacture the Accused

External plastic shells of the product number FS1800JS Products incorporates a common mold part during the injections of both the first and second plastic material components.

421. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS1800JS Products extends to the product rim.

422. On information and belief, the Accused External plastic shells of the product number FS8500RS Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

423. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS8500RS Products incorporates a common mold part during the injections of both the first and second plastic material components.

424. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS8500RS Products extends to the product rim.

425. On information and belief, the Accused External plastic shells of the product number FS6500AG Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

426. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS6500AG Products incorporates a common mold part during the injections of both the first and second plastic material components.

427. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS6500AG Products extends to the product rim.

428. On information and belief, the Accused External plastic shells of the product number FS5000FD Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

429. On information and belief, the process used to manufacture the Accused External plastic shells of the product number FS5000FD Products incorporates a common mold part during the injections of both the first and second plastic material components.

430. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the product number FS5000FD Products extends to the product rim.

431. On information and belief, the Accused External plastic shells of the Porter Cable 7.25" Quick Change Blade-Right Mag Saw product number 423MAG Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

432. On information and belief, the process used to manufacture the Accused External plastic shells of the Porter Cable 7.25" Quick Change Blade-Right Mag Saw product number 423MAG Products incorporates a common mold part during the injections of both the first and second plastic material components.

433. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the Porter Cable 7.25" Quick Change Blade-Right Mag Saw product number 423MAG Products extends to the product rim.

434. On information and belief, the Accused External plastic shells of the Porter Cable Tiger Saw – Var. Spd. Reciprocating Saw Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

435. On information and belief, the process used to manufacture the Accused External plastic shells of the Porter Cable Tiger Saw – Var. Spd. Reciprocating Saw Products incorporates a common mold part during the injections of both the first and second plastic material components.

436. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the Porter Cable Tiger Saw – Var. Spd. Reciprocating Saw Products extends to the product rim.

437. On information and belief, the Accused External plastic shells of the HUSKY Rechargeable Tough Brite Lantern product number 148 530 Products is manufactured with a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove.

438. On information and belief, the process used to manufacture the Accused External plastic shells of the HUSKY Rechargeable Tough Brite Lantern product number 148 530 Products incorporates a common mold part during the injections of both the first and second plastic material components.

440. On information and belief, both the first plastic material component and the second plastic material component of the Accused External plastic shells of the HUSKY Rechargeable Tough Brite Lantern product number 148 530 Products extends to the product rim.

441. On information and belief, all the Accused Products identified in paragraph 17, hereinabove, that are not expressly addressed in paragraphs 18 through 440, inclusive, are manufactured utilizing a process including all elements alleged with regard to the Accused External plastic shells of the DW006 in paragraphs 31 through 56, inclusive, hereinabove, including, but not limited to, use of a common mold part during injection of the first plastic material component and during the injection of the second plastic material component.

442. SRDT provided B&D DEFENDANTS with an opportunity to prove that it was not using the '184 process. Pursuant to 35 U.S.C. § 295, SRDT requested that B&D DEFENDANTS provide information about the manufacturing process for the Accused Products that could either prove or disprove the use of the '184 patented process.

442A. SRDT also offered to negotiate a license with B&D DEFENDANTS for its use of the '184 patent in the event that B&D DEFENDANTS could not demonstrate that it was not using the '184 patented process in making the Accused Products.

443. Despite the evidence of patent infringement, B&D DEFENDANTS have not procured a license for its use of the '184 patent.

444. On information and belief, DEFENDANTS have had a continuing affirmative duty to investigate allegations of infringement, and to not to infringe the '184 patent at least since it was first placed on notice of the '184 patent and its infringement.

445. As of the filing date of this First Amended Complaint, DEFENDANTS have not provided verified, specific, exculpatory manufacturing process information for the Accused Products though B&D DEFENDANTS were requested to do so by SRDT in accordance with 35 U.S.C. § 295.

446. On information and belief, the Black & Decker products which infringe the '184 patent include the Accused Products identified hereinabove, and may include additional products, of which SRDT is not presently aware, which will be identified when SRDT becomes aware of them.

447. On information and belief, DEFENDANTS continue to make, use, sell and/or offer for sale within the United States and this District, and import into the United States Black & Decker products using the '184 patent process, without authority to do so, in violation of 35 U.S.C. § 271, knowing such to be an infringement of the '184 patent, and in wanton and willful disregard of SRDT's '184

patent rights.

448. On information and belief, DEFENDANTS continues to contribute to infringement of the '184 patent and induces others to infringe the '184 patent by virtue of making, selling, using and/or offering for sale within the United States and this District, and importing into the United States, Black & Decker products manufactured using the '184 patent process in wanton and willful disregard of SRDT's '184 patent rights.

449. On information and belief, the conduct of DEFENDANTS in willfully continuing to infringe the '184 patent, and to contribute to infringement and induce others to infringe the '184 patent, by the acts alleged hereinabove despite being on both constructive notice and actual notice, is deliberate, thus making this an exceptional case within the meaning of 35 U.S.C. § 285.

450. On information and belief, DEFENDANTS's total sales of the Accused Products during the last six years are greater than twelve billion dollars ($12,000,000,000.00) and according to proof at trial.

451. On information and belief, SRDT has suffered and is continuing to suffer damages by reason of DEFENDANTS' infringing conduct alleged hereinabove. The damages for DEFENDANTS' conduct is in an amount that constitutes at least a reasonable royalty for all of DEFENDANTS' sales of the Accused Products during the last six years.

452. On information and belief, the reasonable royalty owed to SRDT from DEFENDANTS should be calculated at no less than three percent of gross sales of the Accused Products and according to proof at trial.

453. On information and belief, the reasonable royalty owed to SRDT from DEFENDANTS calculated at four percent of gross sales of the Accused Products exceeds four hundred eighty million dollars ($480,000,000) and according to proof at trial.

454. On information and belief, the reasonable royalty owed to SRDT from

DEFENDANTS should be trebled on account of willful infringement by DEFENDANTS for a total damage award of at least one billion four hundred forty million dollars ($1,440,000,000) and according to proof at trial.

455. On information and belief, SRDT has suffered and will continue to suffer additional irreparable harm and impairment of the value of its patent rights unless DEFENDANTS and their subsidiaries and/or parent companies and/or suppliers are enjoined by this court from continuing to infringe the '184 patent.

PRAYER FOR RELIEF

WHEREFORE, SRDT prays that judgment be entered as follows:

a. For a determination that the Accused Processes are presumed to infringe the '184 patent pursuant to 35 U.S.C. § 295;

b. DEFENDANTS are adjudicated and decreed to have infringed the '184 patent;

c. DEFENDANTS are adjudicated and decreed to have contributed to the infringement of the '184 patent and to have induced others to infringe the '184 patent;

d. DEFENDANTS, their parents, subsidiaries, divisions, affiliates, officers, agents, and attorneys, and those acting in privity or concert with them, are enjoined from further infringement of the '184 patent, and from further contribution to or inducement of the infringement of the '184 patent;

e. DEFENDANTS are ordered to account for damages adequate to compensate SRDT for the infringement of '184 patent, their contributory infringement of the '184 patent, and their inducement of infringement of the '184 patent, in the amount of at least four hundred eighty million dollars ($480,000,000) as a reasonable royalty for all sales of Accused Products and according to proof at trial, and such damages are awarded to SRDT;

f. Such damages as are awarded are trebled to at least one billion four hundred forty million dollars ($1,440,000,000) by the Court pursuant to 35 U.S.C. §

284 by reason of the willful, wanton, and deliberate nature of the infringement;

g. That this case is decreed an "exceptional case" and SRDT is awarded reasonable attorneys' fees by the Court pursuant to 35 U.S.C. § 285;

h. For interest thereon at the legal rate;

i. For costs of suit herein incurred;

j. For such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

SRDT respectfully requests that its claims be tried to a jury.

DATED this Friday, March 09, 2007.

JENS ERIK SORENSEN, as Trustee of SORENSEN RESEARCH AND DEVELOPMENT TRUST, Plaintiff

/s/ J. Michael Kaler

J. Michael Kaler
Melody A. Kramer
Patricia A. Shackelford
Attorneys for Plaintiff

PROOF OF SERVICE

I, J. Michael Kaler declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kaler Law Offices, 9930 Mesa Rim Road, Suite 200, San Diego, California, 92121. I am a member of the State Bar of California and the Bar of this Court.

On March 9, 2007, I served on the parties to this action the following documents:
FIRST AMENDED COMPLAINT

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Raymond P. Niro, Esq. Niro, Scavone, Haller & Niro 181 W. Madison St., Ste. 4600 Chicago, IL 60602 Fax No. 312-236-3137 rnirojr@nshn.com	The Black & Decker Corporation; Black & Decker, Inc.; Black & Decker (US), Inc.; Porter-Cable Corporation; Vector Products, Inc.; B&D Holdings, LLC; (Counsel)	Email
John Christopher Jaczko Jaczko Goddard LLP 4401 Eastgate Mall San Diego, CA 92121 cjaczko@jaczkogoddard.com	The Black & Decker Corporation; Black & Decker, Inc.; Black & Decker (US), Inc.; Porter-Cable Corporation; Vector Products, Inc.; B&D Holdings, LLC; (Counsel)	Email
Frank DiCastri Foley & Lardner, LLP 777 East Wisconsin Avenue Milwaukee, Wisconsin 53202 (414) 297-5773 FDiCastri@foley.com	Phillips Plastics Corporation; Hi-Tech Plastics Inc.; (Counsel)	Email

[X] (BY EMAIL) Via the ECF filing system, or if the identified party is not yet on the ECF generated email list, an email of a true copy of the foregoing documents to an email address represented to be the correct email address for the above noted addressee was sent.

I declare that the foregoing is true and correct, and that this declaration was executed on Friday, March 09, 2007, in San Diego, California.

/s/ J. Michael Kaler

_____

J. Michael Kaler