

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF CONNECTICUT**

RIPMAX LTD.,)	
)	
Plaintiff,)	
)	Civil Action No.
v.)	
)	JURY DEMAND
HORIZON HOBBY, INC.,)	
)	
Defendant.)	
)	

COMPLAINT FOR INFRINGEMENT OF PATENT

Plaintiff for its complaint against Defendant, alleges as follows:

The Parties

1. Plaintiff, Ripmax Ltd., ("Ripmax") is a company of the United Kingdom having a principal place of business at 241 Green Street, Enfield, United Kingdom, EN3 7SJ.
2. Upon information and belief, Defendant, Horizon Hobby, Inc. ("Horizon") is an Illinois corporation having a principal place of business at 4105 Fieldstone Road, Champaign, Illinois 61822-8800.

Jurisdiction and Venue

3. This action is for damages and injunctive relief from patent infringement by Plaintiff, and arises under the United States Patent Laws, particularly 35 U.S.C. §271 et seq.
4. This Court has subject matter jurisdiction based on 28 U.S.C. §1331 and 1338(a).
5. Venue is proper and based on 28 U.S.C. §1391(b), 1391(c), and/or 1400(b).

6. This Court has personal jurisdiction over the defendant by virtue of, inter alia, (1) the defendant's systematic and continuous contacts with Connecticut and (2) it transacts and does business in Connecticut, including Horizon's offer for sale and selling of infringing products in the District of Connecticut and Horizon's maintenance of a web page (www.horizonhobby.com) that is visited by potential customers in Connecticut.

Patent Infringement

7. Plaintiff Ripmax is the owner of the entire right, title and interest in and to United States Patent No. 6,983,128 ("the '128 patent"), entitled "Radio Control Transmitter And Receiver", which was duly and legally issued by the United States Patent and Trademark Office on January 3, 2006 and assigned to Ripmax. A copy of the patent is attached as Exhibit A.

8. Upon information and belief, Horizon has been and still is infringing one or more claims of the '128 patent by making, using, offering for sale and selling Spektrum DSM products, without the authorization of the Plaintiff.

9. Upon information and belief, Defendant has been and still is actively inducing others to infringe one or more claims of the '128 patent through its sale of Spektrum DSM products.

10. Upon information and belief, Defendant has been and still is contributorily infringing one or more claims of the '128 patent through its sale of Spektrum DSM products.

11. Upon information and belief, Defendant's infringement, inducement of infringement, and contributory infringement has been and continues to be willful.

12. Plaintiff has been damaged by loss of sales and customers by the defendant's infringement of the '128 patent, and claim all damages, including but not limited to reasonable royalties, to which it is entitled.

13. The harm to Plaintiff resulting from the infringing acts of Defendant is irreparable, continuing, not fully compensable by money damages and will continue unless enjoined by this Court.

JURY DEMAND

14. Plaintiff demands a jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment as follows:

A. That a permanent injunction be entered against the Defendant, its officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with the Defendant who receive actual notice of the injunction by personal service or otherwise, from any further infringement of the '128 patent pursuant to 35 U.S.C. § 283;

B. That Plaintiff be awarded their damages, suffered by reason of the infringements by Defendant, together with prejudgment interest;

C. That the damages awarded to Plaintiff be trebled pursuant to 35 U.S.C. § 284 due to the willful acts of infringement complained of herein;

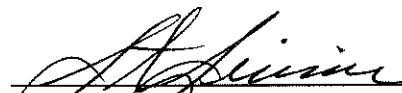
D. That this be declared an exceptional case pursuant to 35 U.S.C. § 285;

E. That Plaintiff be awarded their attorneys fees and costs; and

F. That Plaintiff be awarded any other and further relief that this Court may deem just and proper.

Respectfully submitted,

Date: 3/9/07



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