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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

TAYMAC CORPORATION,)	
)	
Plaintiff,)	
)	
vs.)	No. CV 06-2140 PHX ROS
)	
)	
)	AMENDED COMPLAINT
HUBBELL INCORPORATED,)	
a Delaware Corporation,)	(Demand for Jury Trial)
Defendants.)	
_____)	

Plaintiff, TayMac Corporation ("TayMac") complains of defendant Hubbell Incorporated (Delaware) ("Hubbell") as follows:

1. This is a claim for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of this action under 28 U.S.C. § 1338(a).

PARTIES

2. TayMac is an Arizona corporation having its principal place of business at 1343 N. Tech Blvd., Suite 119, Gilbert, Arizona 85233.

3. TayMac owns and has standing to sue for the infringement of United States Patent No. 5,763,831C1 titled "Universal Cover Plate, Cover Plate Assembly, and Related Method" originally issued on June 9, 1998, together with a reexamination certificate issued on March 1, 2005, and United States Patent No. 6,770,816 B2 titled "Convertible Electrical Device Cover and Method for Installing Same" issued on August 3, 2004 (together the "patents in suit") (a copy of each of the patents in suit is attached).

4. TayMac sells a line of patented while-in-use weatherproof covers for electrical outlets, among other products.

5. Hubbell is a Delaware corporation having its principal place of business at 3902 West Sample Street, South Bend, Indiana 46619.

6. Hubbell sells a wide range of electrical products throughout the United States and internationally, using a variety of divisions and brand names.

VENUE AND PERSONAL JURISDICTION

7. Hubbell is subject to jurisdiction in this Court because it conducts regular and ongoing business in Arizona, and maintains regular, ongoing and systematic sales channels for its products in the State of Arizona. A multitude of Hubbell agents and distributors sell Hubbell products in Arizona.

8. Hubbell also is subject to jurisdiction in this Court because it has committed acts of patent infringement in Arizona that are the subject of this complaint. Specifically, Hubbell has infringed the patents in suit in Arizona by offering for sale and/or selling infringing while-in-use weatherproof covers for electrical outlets.

9. Venue is proper in this district under 28 U.S.C. §1400(b). Hubbell resides in

this District because it is subject to jurisdiction here. Hubbell transacts business in this district, including by offering to sell or selling infringing products and by advertising and selling its products generally to customers in Arizona.

PATENT INFRINGEMENT

10. Hubbell has infringed claims of both patents in suit by its activities in the United States including, among other things, the manufacture, use, importation, sale and/or offer for sale of while-in-use weatherproof covers for electrical outlets, including products sold under the trade name “Bell® Rayntite Universal.”

11. Hubbell also has infringed the patents in suit by intentionally and actively inducing others to infringe and by contributing to the infringement by others by the use, sale and/or offer for sale of its while-in-use weatherproof covers for electrical outlets.

12. Hubbell has been aware of the patents in suit and has, nonetheless, infringed claims of those patents with knowledge of the patents’ scope. As a consequence, Hubbell’s infringement, contributory infringement and/or inducement to infringe have been willful and deliberate.

13. Hubbell’s infringement has injured and will continue to injure TayMac, unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further importation, manufacture, use, offer for sale and/or sale of while-in-use weatherproof covers for electrical outlets, including the “Bell® Rayntite Universal” products, falling within the scope of the patents in suit; and enjoining Hubbell from contributing to and/or inducing infringement of the patents in suit.

14. TayMac has complied with the provisions of 35 U.S.C. § 287 at least by marking its patent numbers on its product.

WHEREFORE, Plaintiff TayMac Corporation asks this Court to enter judgment against Defendant and against its subsidiaries, successors, parents, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

- A. An award of damages adequate to compensate TayMac for the infringements that have occurred, together with prejudgment interest from the date infringement of the patents in suit began;
 - a) Increased damages as permitted by 35 U.S.C. § 284;
 - b) A finding that this case is exceptional and an award to TayMac of its attorneys' fees and costs as provided by 35 U.S.C. § 285;
 - c) A permanent injunction prohibiting further infringement of the patents in suit; and
 - d) Such other and further relief as this Court or a jury may deem proper and just.

JURY DEMAND

TayMac demands a trial by jury on all issues presented in this action.

TAYMAC CORPORATION

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