

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KATHLEEN CALABRESE,)
)
 Plaintiff,)
)
 v.)
)
 ROBERT BOSCH CORPORATION,)
 ROBERT BOSCH GMBH,)
 HONEYWELL INTERNATIONAL, INC.,)
 SIEMENS CORPORATION, and)
 INFINEON TECHNOLOGIES AG)
)
 Defendants.)

00C 3489
Civil Action No.

RECEIVED
JUN 09 2000

JUDGE BUCKLO

MAGISTRATE JUDGE NOLAN

FILED - JUN 26 2000
JUN -9 2000
CLERK COURT
U.S. DISTRICT COURT

COMPLAINT

Plaintiff, Kathleen Calabrese ("Mrs. Calabrese"), complains of defendants, Robert Bosch Corporation ("Bosch Corp."), Robert Bosch GmbH ("Bosch GmbH"), Honeywell International, Inc. ("Honeywell"), Siemens Corporation ("Siemens") and Infineon Technologies AG ("Infineon") as follows:

Nature of Lawsuit

1. This is a complaint for patent infringement of United States Patent No. 4,322,849, entitled "Data Relay System," issued on March 30, 1982 ("the '849 patent").

2. The Court has jurisdiction over the subject matter of the complaint under 28 U.S.C. § 1338. Venue is proper under 28 U.S.C. § 1391(d) and § 1400(b).

Parties

3. Mrs. Calabrese is an individual residing at 13294 Old Mill Road, Waynesboro, Pennsylvania 17268. She is the wife of the

1-1

late Frank A. Calabrese, the inventor of the invention claimed in the '849 patent.

4. Mrs. Calabrese is now the assignee of all right, title and interest in the '849 patent. She, therefore, owns and has standing to sue for infringement of the '849 patent.

5. Bosch Corp. is a Delaware corporation having a principal place of business in this district at 2800 South 25th Avenue, Broadview, Illinois 60153. Bosch Corp. is engaged in the business of manufacturing, marketing, distributing and selling automotive parts and equipment, audio and navigation equipment, power tools, home appliances and industrial equipment and conducts business throughout the United States, including at its facilities in Addison, Illinois, Broadview, Illinois, Chicago, Illinois, Elk Grove Village, Illinois and Huntley, Illinois.

6. Bosch GmbH is a German company having a principal place of business at Robert-Bosch-Platz 1, Postfach 10 60 50, D-70049 Stuttgart, Germany. Bosch GmbH owns 100% of Bosch Corp.

7. Honeywell is a Delaware corporation having a place of business at 101 Columbia Road, Morristown, New Jersey 07962. Honeywell is a diversified manufacturing company engaged in the business of manufacturing, marketing, distributing and selling aerospace products and services, control technologies and products, power generation systems, and specialty chemicals and materials.

8. Siemens is a Delaware corporation having a principal place of business at 1301 Avenue of the Americas, New York, New York 10019. Siemens is engaged in the business of manufacturing,

marketing, distributing and selling products and services in industrial automation, microelectronics and components, and communications. Siemens conducts business in this district through, among other things, its facilities located at 1901 N. Roselle Road, Schaumburg, Illinois 60195; 1000 Deerfield Parkway, Buffalo Grove, Illinois 60089; and 2501 North Barrington Road, Hoffman Estates, Illinois 60195-5203.

9. Infineon Technologies AG (formerly Siemens Semiconductor AG) is a German corporation and a corporate affiliate of Siemens. Infineon has a principal place of business at St.-Martin-Str. 53, 81541 Munich, Germany. Infineon conducts business in the United States out of its regional offices, including its facility in Schaumburg, Illinois, and sells its products through distributors having locations in this district, including not limited to, Avnet, Inc., Pioneer-Standard Electronics, Inc. and Insight Electronics LLC. Siemens AG (the German parent of Siemens Corporation) owns 71% of Infineon.

10. Bosch Corp., Bosch GmbH, Honeywell, Siemens and Infineon (collectively "defendants") have directly and contributorily infringed the '849 patent in the United States. As stated below, defendants have also induced others to infringe the '849 patent in the United States.

Square D Action

11. Mrs. Calabrese was a plaintiff with her late husband in Frank A. Calabrese, et al. v. Square D Company, Case No. 97 C 2199, filed and tried before the United States District Court for the

Northern District of Illinois (Leinenweber, J.) (the "Square D Action").

12. In the Square D Action, on January 26, 2000 a jury returned a \$13.2 million verdict against Square D Company and in favor of Frank and Kathy Calabrese, finding that Square D, through its manufacture, sale, promotion and use of its SERIPLEX products, willfully infringed the '849 patent. Judge Leinenweber denied Square D's post-trial motions JMOL and for a new trial and added \$6.8 million in prejudgment interest to the \$13.2 million award (Exhibit A).

13. The total award of \$20 million in the Square D Action represented more than 75% of the total sales of the infringing SERIPLEX products which Square D claimed at the trial it had made through December 1999.

Acts of Infringement By Bosch

14. This Court has personal jurisdiction over Bosch Corp. and Bosch GmbH (collectively "Bosch") by virtue of their tortious acts of patent infringement committed in Illinois and their transaction of business in Illinois. Bosch has literally infringed the '849 patent by making, using, selling or offering to sell the Bosch Controller Area Network ("CAN") protocol and/or components thereof, including, but not limited to, "CC750 serial communications controllers," "CC760 CAN-Gateway" products, "CC770 serial communications controllers," "CAN Bus transceivers," CAN "IP modules" (such as "CAN Core" modules, "A_CAN" modules and "C_CAN" modules) and other industrial products incorporating the CAN bus

technology, such as electro-hydraulic valves with CAN bus interface.

15. Bosch has also actively induced infringement of the '849 patent in the United States by developing, supporting, promulgating, providing technical assistance for, advertising and otherwise promoting the CAN protocol to others and by selling products specially designed and adapted to be used in connection with the CAN system for resale. For example, Bosch has licensed to "high-volume manufacturers," "ASIC-manufacturers" and universities the CAN Protocol for lump-sum and/or periodic royalty payments. Bosch has also provided a "VHDL Reference model" to encourage and induce semiconductor designers and manufacturers to build their own CAN-compatible products and components.

16. As a result, Bosch has successfully recruited users and licensed the CAN protocol to a large number of third-party manufacturers which now make, offer to sell and sell CAN-compatible products and components in the United States, such as Hewlett-Packard, Hitachi, Intel, LSI, Mitsubishi, Motorola, National Semiconductors, NEC, Toshiba, Texas Instruments, Fujitsu and ITT.

17. Bosch has also contributorily infringed the '849 patent by selling and offering to sell in the United States and/or importing into the United States components of the CAN system (such as CAN IP modules, transceivers, controllers and gateways) that are covered by the claims of the '849 patent, knowing such components

to be specially made or specially adapted for use in an infringement of the '849 patent and not as staple articles or commodities of commerce suitable for substantial noninfringing use.

18. Bosch was given actual notice of its infringement of the '849 patent, at the latest, by March 20, 1997.

19. The acts of infringement by Bosch have been willful and deliberate, having been done with full knowledge of the '849 patent, at least since March 20, 1997.

20. Mrs. Calabrese has been damaged by the infringing acts of Bosch. She is entitled to recover damages from Bosch in an amount adequate to compensate her for the infringement that has occurred.

Acts of Infringement By Honeywell

21. This Court has personal jurisdiction over Honeywell by virtue of its tortious acts of patent infringement, which have been committed in Illinois, and its transaction of business in Illinois. Honeywell designs, markets and sells the accused Smart Distributed System ("SDS") systems and components at its Micro Switch division facility located at 11 West Spring Street, Freeport, Illinois 61032.

22. Honeywell has literally infringed the '849 patent by making, using, selling or offering to sell the SDS bus technology and/or components thereof in the United States, including in this judicial district.

23. Honeywell has also actively induced infringement of the '849 patent in the United States by licensing, supporting, promulgating, providing technical assistance for, providing

financial incentives for, advertising and otherwise promoting the technology of its SDS system to others and by selling products specially designed and specially adapted to be used in connection with the SDS system for resale.

24. Honeywell has also contributorily infringed the '849 patent by selling and offering to sell in the United States and/or importing into the United States components of the SDS bus system which are covered by the claims of the '849 patent, knowing the components to be specially made or specially adapted for use in an infringement of the '849 patent and not as staple articles or commodities of commerce suitable for substantial noninfringing use.

25. Honeywell was given actual notice of its infringement of the '849 patent, at the latest, by March 20, 1997.

26. The acts of infringement by Honeywell have been willful and deliberate, having been done with full knowledge of the '849 patent, at least since March 20, 1997.

27. Mrs. Calabrese has been damaged by the infringing acts of Honeywell. She is entitled to recover damages from Honeywell in an amount adequate to compensate her for the infringement that has occurred.

Acts of Infringement By Siemens

28. This Court has personal jurisdiction over Siemens by virtue of its tortious acts of patent infringement, which have been committed in Illinois, and its transaction of business in Illinois, including at its facilities located at 1901 N. Roselle Road, Schaumburg, Illinois 60195; 1000 Deerfield Parkway, Buffalo Grove,

Illinois 60089; and 2501 North Barrington Road, Hoffman Estates, Illinois 60195-5203.

29. Siemens has literally infringed the '849 patent by making, using, selling or offering to sell the PROFIBUS bus technology and/or components thereof in this district and throughout the United States.

30. Siemens has also actively induced infringement of the '849 patent by actively assisting equipment developers and original equipment manufacturers with integration of the PROFIBUS system into their equipment, by supporting, promulgating, providing technical assistance for, and otherwise promoting the PROFIBUS technology to others, including through its PROFIBUS Interface Center, and by selling products specially designed and adapted to be used for the PROFIBUS system for resale.

31. Siemens has also contributorily infringed the '849 patent by selling and offering to sell in the United States and/or importing into the United States components of the PROFIBUS system which are covered by the claims of the '849 patent, knowing the components to be specially made or specially adapted for use in an infringement of the '849 patent and not as staple articles or commodities of commerce suitable for substantial noninfringing use.

32. Siemens was given actual notice of its infringement of the '849 patent, at the latest, by March 20, 1997.

33. The acts of infringement by Siemens have been willful and deliberate, having been done with full knowledge of the '849 patent, at least since March 20, 1997.

34. Mrs. Calabrese has been damaged by the infringing acts of Siemens. She is entitled to recover damages from Siemens in an amount adequate to compensate her for the infringement that has occurred.

Acts of Infringement By Infineon

35. This Court has personal jurisdiction over Infineon by virtue of its tortious acts of patent infringement, which have been committed in the State of Illinois, and its transaction of business in Illinois, including out of its regional office located in Schaumburg, Illinois and through its distributors, such as Avnet, Inc., Pioneer-Standard Electronics, Inc. and Insight Electronics LLC, all having locations in this judicial district.

36. Infineon has literally infringed the '849 patent by making, using, selling or offering to sell the CAN system and/or components thereof throughout the United States, including, but not limited to, CAN Transceiver Products, CAN microcontrollers and stand-alone full-CAN controllers.

37. Infineon has also actively induced infringement of the '849 patent in the United States by supporting, providing technical assistance and training for, and otherwise promoting the CAN technology to others and by selling products specially designed and adapted to be used in connection with the CAN system for resale.

38. Infineon has also contributorily infringed the '849 patent by selling and offering to sell in the United States and/or importing into the United States components of the CAN system which are covered by the claims of the '849 patent, knowing the

components to be specially made or specially adapted for use in an infringement of the '849 patent and not as staple articles or commodities of commerce suitable for substantial noninfringing use.

39. Infineon's corporate affiliate, Siemens, was given actual notice of its infringement of the '849 patent, at the latest, by March 20, 1997.

40. Mrs. Calabrese has been damaged by the infringing acts of Infineon. She is entitled to recover damages from Infineon in an amount adequate to compensate her for the infringement that has occurred.

PRAYER FOR RELIEF

WHEREFORE, Mrs. Calabrese seeks judgment against each of the defendants, individually, separately and jointly, as follows:

A. An award of damages adequate to compensate Mrs. Calabrese for the infringement of the '849 patent that has occurred, but in no event less than a reasonable royalty as set by the jury in the Square D Action;

B. A determination that infringement by each defendant has been willful and deliberate and an award to Mrs. Calabrese of damages as provided for in the second paragraph of 35 U.S.C. § 284, together with prejudgment interest from the date infringement began;

C. An award to Mrs. Calabrese of her reasonable attorneys' fees under 35 U.S.C. § 285;

D. Such other and further relief as this Court and/or a jury may deem proper and just.

JURY DEMAND

Mrs. Calabrese hereby demands a trial by jury on all issues presented in this Complaint that are so triable.



Raymond P. Niro
John C. Janka
Christopher J. Lee
Paul C. Gibbons
Dina M. Pascarelli
NIRO, SCAVONE, HALLER & NIRO
181 West Madison, Suite 4600
Chicago, Illinois 60602
(312) 236-0733

Attorneys for Kathleen Calabrese

United States District Court, Northern District of Illinois

| | | | |
|--|---|--|-----------|
| Name of Assigned Judge or Magistrate Judge | Harry D. Leinenweber | Sitting Judge if Other than Assigned Judge | |
| CASE NUMBER | 97 C 2199 | DATE | 3/24/2000 |
| CASE TITLE | Frank A. Calabrese vs. Square D Company | | |

[In the following box (a) indicate the party filing the motion, e.g., plaintiff, defendant, 3rd party plaintiff, and (b) state briefly the nature of the motion being presented.]

MOTION:

DOCKET ENTRY:

- (1) Filed motion of [use listing in "Motion" box above.]
- (2) Brief in support of motion due _____.
- (3) Answer brief to motion due _____. Reply to answer brief due _____.
- (4) Ruling/Hearing on _____ set for _____ at _____.
- (5) Status hearing[held/continued to] [set for/re-set for] on _____ set for _____ at _____.
- (6) Pretrial conference[held/continued to] [set for/re-set for] on _____ set for _____ at _____.
- (7) Trial[set for/re-set for] on _____ at _____.
- (8) [Bench/Jury trial] [Hearing] held/continued to _____ at _____.
- (9) This case is dismissed [with/without] prejudice and without costs[by/agreement/pursuant to]
 - FRCP4(m) General Rule 21 FRCP41(a)(1) FRCP41(a)(2).
- (10) [Other docket entry] Enter amended final judgment in favor of plaintiffs and against the defendant in the amount of \$13,200,000.00 in compensatory damages plus prejudgment interest in the amount of \$6,819,780.00 .
- (11) [For further detail see order attached to the original minute order.]

| | | | | | |
|-------------------------------------|---|--|-------------------|-----------------|---------------------------|
| <input type="checkbox"/> | No notices required, advised in open court. | | number of notices | Document Number | |
| <input type="checkbox"/> | No notices required | | | | date docketed |
| <input type="checkbox"/> | Notices mailed by judge's staff. | | | | docketing deputy initials |
| <input type="checkbox"/> | Notified counsel by telephone. | | | | date mailed notice |
| <input checked="" type="checkbox"/> | Docketing to mail notices. | | | | mailing deputy initials |
| <input type="checkbox"/> | Mail AO 450 form. | | | | |
| <input type="checkbox"/> | Copy to judge/magistrate judge. | | | | |
| WAP | courtroom deputy's initials | Date/time received in court clerk's office | | | |

EXHIBIT
A

COPY

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FRANK A. CALABRESE and
KATHLEEN CALABRESE

Plaintiffs,

v.

SQUARE D COMPANY,

Defendant.

)
)
)
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Civil Action No. 97 C 2199

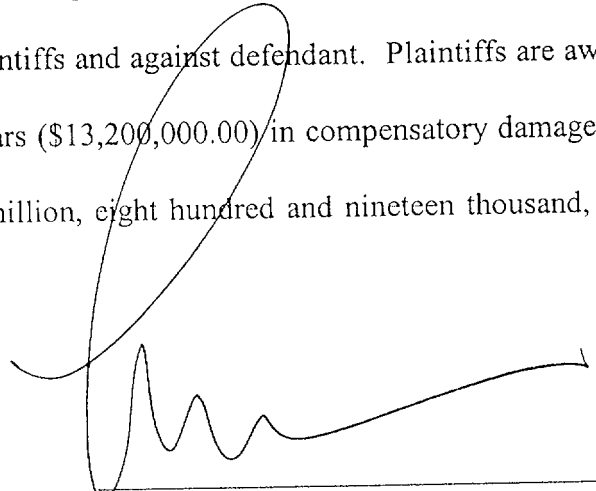
Honorable Harry D. Leinenweber

FINAL JUDGMENT

The Court enters amended final judgment pursuant to Fed.R.Civ.P. 58 and 59(e) on the January 26, 2000 jury verdict in favor of plaintiffs and against defendant. Plaintiffs are awarded thirteen million, two hundred thousand dollars (\$13,200,000.00) in compensatory damages plus prejudgment interest in the amount of six million, eight hundred and nineteen thousand, seven hundred and eighty dollars (\$6,819,780.00).

ENTERED:

March 24, 2000



Honorable Harry D. Leinenweber

JS 44
(Rev. 12/96)

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

Kathleen Calabrese

DEFENDANTS

Robert Bosch Corporation, Robert Bosch, GmbH, Honeywell International, Inc., Siemens Corporation and Infineon Technologies AG

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF _____
(EXCEPT IN U.S. PLAINTIFF CASES)

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT NY
NOT A CONDEMNATION CASE. USE THE LOCATION OF THE LAND IN NY. YES/NO

000 3489

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)
Niro, Scavone, Haller & Niro
181 West Madison, Suite 4600
Chicago, Illinois 60602-4515
JUN 09 2000

ATTORNEYS (IF KNOWN)

JUDGE BUCKLO

lead

MAGISTRATE JUDGE NOLAN

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | | | | | |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| | PTF | DEF | | PTF | DEF |
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- 1 Original Proceeding
- 2 Removed from State Court
- 3 Remanded from Appellate Court
- 4 Reinstated or Reopened
- 5 Transferred from another district (specify)
- 6 Multidistrict Litigation
- 7 Appeal to District Judge from Magistrate Judgment

V. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

| CONTRACT | TORTS | FORFEITURE/PENALTY | BANKRUPTCY | OTHER STATUTE |
|---|--|---|--|--|
| <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability | PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury | <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other | <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input checked="" type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark | <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/CC Rates <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced Corrupt Organizations <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodity Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access <input type="checkbox"/> 950 Constitutionality of State Statutes <input type="checkbox"/> 890 Other Statutory Action |
| REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property | CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 440 Other Civil Rights | PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence HABEAS CORPUS: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition | LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt Relations <input type="checkbox"/> 730 Labor/Mgmt Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act | SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS - Third Party 26 USC 7609 |

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

28 U.S.C. Section 1338, patent infringement

This case is related to Civil Action No. 97 C 2199

VII. REQUESTED IN COMPLAINT

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint

JURY DEMAND: YES NO

VIII. This case is not a refiling of a previously dismissed action. Related to Civil Action No. 97 C 2199
 is a refiling of case number _____, previously dismissed by Judge _____

DATE

6/8/00

SIGNATURE OF ATTORNEY OF RECORD

[Signature]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

In the Matter of

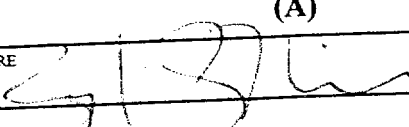
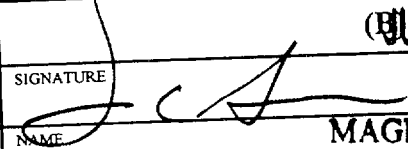
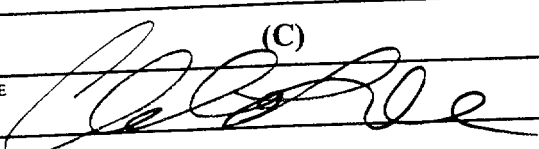
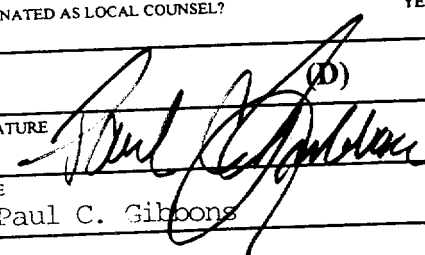
KATHLEEN CALABRESE
v.
ROBERT BOSCH CORPORATION, et al.

Case Number:
000 3489

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Plaintiff Kathleen Calabrese

06 JUN 09 11:15 AM
 CLERK U.S. DISTRICT COURT
 NORTHERN DISTRICT OF ILLINOIS

| | | | |
|--|--|--|--|
| (A) | | (B) JUDGE BUCKLO | |
| SIGNATURE  | | SIGNATURE  | |
| NAME Raymond P. Niro | | NAME John C. Janka | |
| FIRM Niro, Scavone, Haller & Niro | | FIRM (Same) | |
| STREET ADDRESS 181 West Madison, Suite 4600 | | STREET ADDRESS | |
| CITY/STATE/ZIP Chicago, Illinois 60602-4515 | | CITY/STATE/ZIP | |
| TELEPHONE NUMBER (312) 236-0733 | | TELEPHONE NUMBER | |
| IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 2054930 | | IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6196214 | |
| MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | | MEMBER OF TRIAL BAR? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | |
| TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | | TRIAL ATTORNEY? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/> | |
| | | DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> | |
| (C) | | (D) | |
| SIGNATURE  | | SIGNATURE  | |
| NAME Christopher J. Lee | | NAME Paul C. Gibbons | |
| FIRM (Same) | | FIRM (Same) | |
| STREET ADDRESS | | STREET ADDRESS | |
| CITY/STATE/ZIP | | CITY/STATE/ZIP | |
| TELEPHONE NUMBER | | TELEPHONE NUMBER | |
| IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6216420 | | IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6242971 | |
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| TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> | | TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/> | |
| DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> | | DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> | |

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

In the Matter of

KATHLEEN CALABRESE
v.
ROBERT BOSCH CORP., et al.

Case Number **00C 3489**

APPEARANCES ARE HEREBY FILED BY THE UNDERSIGNED AS ATTORNEY(S) FOR:

Plaintiff Kathleen Calabrese

| | | | |
|--|---|---|--|
| XXXX (E) | | (B) JUDGE BUCKLO | |
| SIGNATURE <i>Dina M. Pascarelli</i> | | SIGNATURE | |
| NAME Dina M. Pascarelli | | NAME MAGISTRATE JUDGE NO | |
| FIRM Niro, Scavone, Haller & Niro | | FIRM | |
| STREET ADDRESS 181 West Madison, Suite 4600 | | STREET ADDRESS | |
| CITY/STATE/ZIP Chicago, Illinois 60602-4515 | | CITY/STATE/ZIP | |
| TELEPHONE NUMBER (312) 236-0733 | | TELEPHONE NUMBER | |
| IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) 6270400 | | IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) | |
| MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> | MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/> | | |
| TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> | TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/> | | |
| | DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/> | | |
| (C) | | (D) | |
| SIGNATURE | | SIGNATURE | |
| NAME | | NAME | |
| FIRM | | FIRM | |
| STREET ADDRESS | | STREET ADDRESS | |
| CITY/STATE/ZIP | | CITY/STATE/ZIP | |
| TELEPHONE NUMBER | | TELEPHONE NUMBER | |
| IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) | | IDENTIFICATION NUMBER (SEE ITEM 4 ON REVERSE) | |
| MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/> | MEMBER OF TRIAL BAR? YES <input type="checkbox"/> NO <input type="checkbox"/> | | |
| TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/> | TRIAL ATTORNEY? YES <input type="checkbox"/> NO <input type="checkbox"/> | | |
| DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/> | DESIGNATED AS LOCAL COUNSEL? YES <input type="checkbox"/> NO <input type="checkbox"/> | | |