

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

BELDEN TECHNOLOGIES, INC.,

Plaintiff

v.

LS CORP., LS CABLE LTD., and
LS CABLE AMERICA, INC.,

Defendants.

Civil Action No.: 1:08-cv-00823-SLR

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT AND JURY DEMAND

1. Plaintiff Belden Technologies, Inc. ("Belden") is a Delaware corporation having a principal place of business at 7701 Forsyth Boulevard, Suite 800, St. Louis, Missouri 63105.

2. On information and belief, Defendant LS Corp. is a corporation organized under the laws of the Republic of Korea, having a principal place of business at the LS Tower, 1026-6 Hogyedong, Dongan-gu, Anyang-si Gyeonggi-do, Republic of Korea 431-080.

3. On information and belief, Defendant LS Cable Ltd. is a corporation organized under the laws of the Republic of Korea, having a principal place of business at the LS Tower, 1026-6 Hogyedong, Dongan-gu, Anyang-si Gyeonggi-do, Republic of Korea 431-080.

4. On information and belief, Defendant LS Cable America, Inc. is a New Jersey company, having a principal place of business at 920 Sylvan Avenue, Englewood Cliffs, New Jersey 07632.

5. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§1331 and 1338(a).

6. As alleged herein, Defendants – individually, any two or more of them together, and/or any one or more of them jointly with others – have infringed (literally and/or by equivalents), and continue to infringe, Belden’s patent rights by making, using, importing, selling, and/or offering to sell products covered by one or more patent claims – or by performing any method claimed therein – within the United States, and/or by contributing to or inducing such infringement.

Count I
Infringement of U.S. Patent No. 7,339,116

7. Belden is the owner of United States Patent No. 7,339,116 (“the ’116 patent”) entitled “High Performance Data Cable,” and has the right to sue on the ’116 patent. A copy of the ’116 patent is attached as Exhibit A.

8. Defendant LS Corp. has infringed (literally and/or by equivalents), and is continuing to infringe, the ’116 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the ’116 patent claims within the United States and/or by contributing to or inducing such infringement.

9. Defendant LS Corp.’s infringement of the ’116 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

10. Defendant LS Cable Ltd. has infringed (literally and/or by equivalents), and is continuing to infringe, the ’116 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the ’116 patent claims within the United States and/or by contributing to or inducing such infringement.

11. Defendant LS Cable Ltd.'s infringement of the '116 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

12. Defendant LS Cable America, Inc. has infringed (literally and/or by equivalents), and is continuing to infringe, the '116 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '116 patent claims within the United States and/or by contributing to or inducing such infringement.

13. Defendant LS Cable America, Inc.'s infringement of the '116 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

Count II
Infringement of U.S. Patent No. 7,135,641

14. Belden repeats and realleges the foregoing paragraphs.

15. Belden is the owner of United States Patent No. 7,135,641, entitled "Data Cable With Cross-Twist Cabled Core Profile" ("the '641 patent") and has the right to sue on the '641 patent. A copy of the '641 patent is attached as Exhibit B.

16. Defendant LS Corp. has infringed (literally and/or by equivalents), and is continuing to infringe, the '641 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '641 patent claims within the United States and/or by contributing to or inducing such infringement.

17. Defendant LS Corp.'s infringement of the '641 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will

continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

18. Defendant LS Cable Ltd. has infringed (literally and/or by equivalents), and is continuing to infringe, the '641 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '641 patent claims within the United States and/or by contributing to or inducing such infringement.

19. Defendant LS Cable Ltd.'s infringement of the '641 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

20. Defendant LS Cable America, Inc. has infringed (literally and/or by equivalents), and is continuing to infringe, the '641 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '641 patent claims within the United States and/or by contributing to or inducing such infringement.

21. Defendant LS Cable America, Inc.'s infringement of the '641 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

Count III
Infringement of U.S. Patent No. 6,596,944

22. Belden repeats and realleges the foregoing paragraphs.

23. Belden is the owner of United States Patent No. 6,596,944, entitled "Enhanced Data Cable With Cross-Twist Cabled Core Profile," ("the '944 patent") and has the right to sue on the '944 patent. A copy of the '944 patent is attached as Exhibit C.

24. Defendant LS Corp. has infringed (literally and/or by equivalents), and is continuing to infringe, the '944 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '944 patent claims within the United States and/or by contributing to or inducing such infringement.

25. Defendant LS Corp.'s infringement of the '944 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

26. Defendant LS Cable Ltd. has infringed (literally and/or by equivalents), and is continuing to infringe, the '944 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '944 patent claims within the United States and/or by contributing to or inducing such infringement.

27. Defendant LS Cable Ltd.'s infringement of the '944 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

28. Defendant LS Cable America, Inc. has infringed (literally and/or by equivalents), and is continuing to infringe, the '944 patent by making, using, importing, selling, and/or offering to sell products covered by one or more of the '944 patent claims within the United States and/or by contributing to or inducing such infringement.

29. Defendant LS Cable America, Inc.'s infringement of the '944 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has

caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

Count IV
Infringement of U.S. Patent No. 6,074,503

30. Belden repeats and realleges the foregoing paragraphs.

31. Belden is the owner of United States Patent No. 6,074,503, entitled "Making enhanced data cable with cross-twist cabled core profile," ("the '503 patent") and has the right to sue on the '503 patent. A copy of the '503 patent is attached as Exhibit D.

32. Defendant LS Corp. has infringed (literally and/or by equivalents), and is continuing to infringe, the '503 patent, by performing any method claimed therein, within the United States, and/or by selling, offering to sell, using, and/or importing into the United States products made by any method claimed therein, and/or by contributing to or inducing such infringement.

33. Defendant LS Corp.'s infringement of the '503 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

34. Defendant LS Cable Ltd. has infringed (literally and/or by equivalents), and is continuing to infringe, the '503 patent by performing any method claimed therein, within the United States, and/or by selling, offering to sell, using, and/or importing into the United States products made by any method claimed therein, and/or by contributing to or inducing such infringement.

35. Defendant LS Cable Ltd.'s infringement of the '503 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has

caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

36. Defendant LS Cable America, Inc. has infringed (literally and/or by equivalents), and is continuing to infringe, the '503 patent by performing any method claimed therein, within the United States, and/or by selling, offering to sell, using, and/or importing into the United States products made by any method claimed therein, and/or by contributing to or inducing such infringement.

37. Defendant LS Cable America, Inc.'s infringement of the '503 patent is and has been willful, has caused and will continue to cause Belden to suffer substantial damages, and has caused and will continue to cause Belden to suffer irreparable harm for which there is no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Belden requests that this Court enter judgment as follows ordering that:

(a) Defendants infringe the '116, '641, '944, and '503 patents by their making, using, offering for sale, selling and/or offering to sell products covered by one or more of the '116, '641, '944, and '503 patent claims within the United States, and/or by contributing to or inducing such infringement;

(b) Defendants' infringement of '116, '641, '944, and '503 patents is willful;

(c) Defendants and their affiliates, subsidiaries, officers, directors, employees, agents, representatives, licensees, successors, assigns, and all those acting for any of them or on their behalf, or acting in concert with them, be preliminarily and permanently enjoined from further infringement of Belden's patent rights.

(d) Plaintiff be awarded compensatory damages and costs, with prejudgment interest;

(e) Plaintiff be awarded treble damages for the willful patent infringement;

(f) This case be declared to be exceptional in favor of Plaintiffs under 35 U.S.C.

§285, and that Plaintiff be awarded their costs, attorneys' fees, and other expenses incurred in connection with this action; and

(g) Plaintiff will be awarded such other relief as the Court deems just and proper.

JURY DEMAND

Belden demands a trial by jury on all issues so triable.

Respectfully submitted,

BELDEN TECHNOLOGIES, INC.

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