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GIFFORD, KRASS, GROH, SPRINKLE, ANDERSON & CITKOWSKI, P.C. 280 N. OLD WOODWARD AVENUE, STE. 400, BIRMINGHAM, MICHIGAN 48009-5394 (248) 647-6000

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DEDOES INDUSTRIES, INC.,  
a Michigan corporation,

Plaintiff,

vs.

FILLON TECHNOLOGIES NORTH  
AMERICA, INC., f/k/a FILLON PICHON USA,  
a Rhode Island corporation, and  
FILLON PICHON S.A.,  
a French corporation,  
jointly and severally,

Defendants.

03-71765

Case No.

ANNA DIGGS TAYLOR

MAGISTRATE JUDGE R. STEVEN WHALEY

COMPLAINT AND DEMAND FOR JURY TRIAL

U.S. DIST. COURT CLERK  
EAST DIST. MICHIGAN  
DETROIT

2003 MAY -8 A 11:59

FILED

Parties and Jurisdiction

1. Plaintiff Dedoes Industries, Inc. is a Michigan corporation having a principal place of business in Walled Lake, Michigan.
2. Upon information and belief, Defendant Fillon Technologies North America, Inc. f/k/a Fillon Pichon USA is a corporation of Rhode Island having offices and a place of business at 70 Commercial Way, East Providence, Rhode Island 02914-1006.
3. Upon information and belief, Defendant Fillon Pichon, s.a. is a French corporation having a place of business at 28210 Faverolles, France.

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4. This action arises under the patent laws of the United States. This Court has jurisdiction under 35 USC Section 281 and 28 USC Section 1338. Venue is proper under 28 USC Section 1400(b) and 28 USC Section 1391(c).

**Count I - Patent Infringement**

5. Plaintiff realleges Paragraphs 1-4 as if fully set forth herein.

6. Plaintiff is the owner by assignment of U.S. Letters Patent No. 5,482,370 issued January 9, 1996, a copy of which is attached to this complaint as Exhibit A.

7. Upon information and belief, Defendants have infringed said Letters Patent No. 5,482,370 and will continue to do so in this judicial district and elsewhere throughout the United States to the irreparable damage of Plaintiff unless enjoined by this Court; 35 USC Section 271(a), Section 271(b) and Section 271(c)

8. The aforementioned actions by Defendant have occurred with full knowledge of Plaintiff's patent rights.

9. The aforementioned acts constitute willful infringement of said Letters Patent No. 5,482,370.

WHEREFORE, Plaintiff prays that:

1. the Defendants, officers, agents, employees, successors and assigns and all persons or entities holding by, through or under them and all those acting for them or in their behalf, be preliminarily enjoined during the pendency of this action and thereafter permanently enjoined from further infringement of Plaintiff's Letters Patent No. 5,482,370.

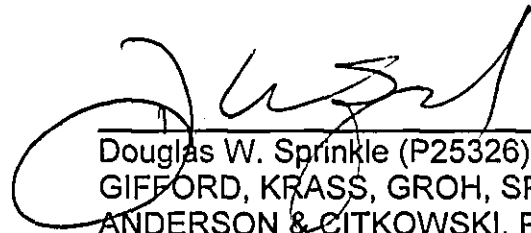
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2. the Defendants, both severally and jointly, account for and pay to Plaintiff all damages sustained by Plaintiff as determined by the jury by reasons of Defendants' infringement of said Letters Patent.

3. this Court declare this case to be exceptional pursuant to 35 USC Section 285 and award Plaintiff triple damages as determined by the jury together with Plaintiff's attorney fees and costs associated with this action.

4. Plaintiff be granted such other and further relief as this Court deems just and equitable.

Respectfully submitted,



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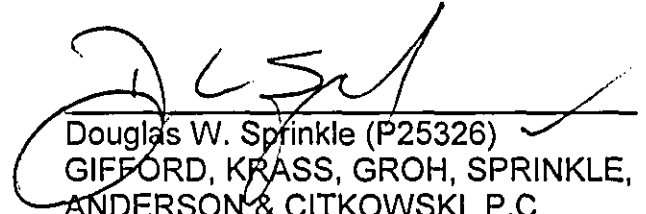
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**JURY DEMAND**

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

Respectfully submitted,



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Date: 5/8/03

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

**SEE CASE FILE FOR  
ADDITIONAL  
DOCUMENTS OR PAGES  
THAT WERE NOT  
SCANNED**