IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ANALOG DEVICES, INC., Plaintiff, v. KNOWLES ELECTRONICS LLC, Defendant.	Civil Action No. _____ JURY TRIAL DEMANDED

COMPLAINT

Analog Devices, Inc. ("Analog") brings this action under the patent laws of the United States 35 U.S.C. § 1, *et seq.*, against Knowles Electronics LLC ("Knowles") for infringement of four United States patents and alleges as follows:

PARTIES

1. Analog is a Massachusetts corporation with a principal place of business at Three Technology Way, Norwood, Massachusetts 02062.

2. Upon information and belief, Knowles is a Delaware limited liability company with a principal place of business at 1151 Maplewood Drive, Itasca, Illinois 60143.

JURISDICTION AND VENUE

3. This case arises under the patent laws of the United States, 35 U.S.C. § 1, *et seq.*

4. The Court has subject matter jurisdiction over this Complaint pursuant to 28 U.S.C. §§ 1331 and 1338.

5. Venue is proper in this District under 28 U.S.C. §§ 1391(a) and 1400(b).

BACKGROUND

6. Analog is the owner by assignment of all right, title, and interest in U.S. Patent No. 6,147,528 (the "'528 Patent") entitled "Method Of Invoking A Power-Down Mode On An Integrated Circuit By Monitoring A Normally Changing Input Signal" The '528 Patent was duly issued by the United States Patent & Trademark Office ("USPTO") on November 14, 2000 and is valid and enforceable. A copy of the '528 Patent is attached hereto as Exhibit 1.

7. Analog is the owner by assignment of all right, title, and interest in U.S. Patent No. 7,364,942 (the "'942 Patent") entitled "Process For Wafer Level Treatment To Reduce Stiction And Passivate Micromachined Surfaces And Compounds Used Therefor." The '942 Patent was duly issued by the USPTO on April 29, 2008 and is valid and enforceable. A copy of the '942 Patent is attached hereto as Exhibit 2.

8. Analog is the owner by assignment of all right, title, and interest in U.S. Patent No. 7,220,614 (the "'614 Patent") entitled "Process For Wafer Level Treatment To Reduce Stiction And Passivate Micromachined Surfaces And Compounds Used Therefor." The '614 Patent was duly issued by the USPTO on May 22, 2007 and is valid and enforceable. A copy of the '614 Patent is attached hereto as Exhibit 3.

9. Analog is the owner by assignment of all right, title, and interest in U.S. Patent No. 6,674,140 (the "'140 Patent") entitled "Process For Wafer Level Treatment To Reduce Stiction And Passivate Micromachined Surfaces And Compounds Used Therefor." The '140 Patent was duly issued by the USPTO on January 6, 2004, and is valid and enforceable. A copy of the '140 Patent is attached hereto as Exhibit 4.

COUNT I – THE '528 PATENT

10. Analog repeats each allegation of paragraphs 1-9 as if set forth here in full.

11. Upon information and belief, Knowles, without authority, makes, uses, offers to sell, sells within the United States, and/or imports into the United States, products that incorporate or make use of one or more inventions covered by the '528 Patent, including but not limited to its MEMS microphones, thereby infringing, contributing to the infringement of, and/or actively inducing infringement of one or more claims of the '528 Patent.

12. Upon information and belief, Knowles' infringement of the '528 Patent is willful.

13. Analog is being, and will continue to be, seriously damaged and irreparably harmed unless Knowles is enjoined by the Court from the actions complained of herein, and thus Analog is without an adequate remedy at law.

COUNT II – THE '942 PATENT

14. Analog repeats each allegation of paragraphs 1-13 as if set forth here in full.

15. Upon information and belief, Knowles, without authority, makes, uses, offers to sell, sells within the United States, and/or imports into the United States, products that incorporate or make use of one or more inventions covered by the '942 Patent, including but not limited to its MEMS products, thereby infringing, contributing to the infringement of, and/or actively inducing infringement of one or more claims of the '942 Patent.

16. Upon information and belief, Knowles' infringement of the '942 Patent is willful.

17. Analog is being, and will continue to be, seriously damaged and irreparably harmed unless Knowles is enjoined by the Court from the actions complained of herein, and thus Analog is without an adequate remedy at law.

COUNT III – THE '614 PATENT

18. Analog repeats each allegation of paragraphs 1-17 as if set forth here in full.

19. Upon information and belief, Knowles, without authority, makes, uses, offers to sell, sells within the United States, and/or imports into the United States, products that incorporate or make use of one or more inventions covered by the '614 Patent, including but not limited to its MEMS products, thereby infringing, contributing to the infringement of, and/or actively inducing infringement of one or more claims of the '614 Patent.

20. Upon information and belief, Knowles' infringement of the '614 Patent is willful.

21. Analog is being, and will continue to be, seriously damaged and irreparably harmed unless Knowles is enjoined by the Court from the actions complained of herein, and thus Analog is without an adequate remedy at law.

COUNT IV – THE '140 PATENT

22. Analog repeats each allegation of paragraphs 1-21 as if set forth here in full.

23. Upon information and belief, Knowles, without authority, makes, uses, offers to sell, sells within the United States, and/or imports into the United States, products that likely incorporate or make use of one or more inventions covered by the '140 Patent, including but not limited to its MEMS products, thereby likely infringing, contributing to the infringement of, and/or actively inducing infringement of one or more claims of the '140 Patent. Because information regarding the composition of the "organo silicon compound" used in Knowles' products is within the custody and control of Knowles, this allegation may be amended, as appropriate, after limited discovery.

PRAYER FOR RELIEF

WHEREFORE, Analog prays for judgment against Knowles as follows:

(a) Find that Knowles has committed acts of patent infringement in violation of the Patent Act, 35 U.S.C. § 271;

(b) Enter an injunction enjoining Knowles, its officers, agents, servants, employees, and attorneys, and any other persons in active concert or participation with it, from continuing the acts herein complained of, and that Knowles and such other persons be permanently enjoined and restrained from further infringing;

(c) Require Knowles to file with the Court, within thirty (30) days after entry of final judgment, a written statement under oath setting forth in detail the manner in which Knowles has complied with the injunction;

(d) Award Analog all relief available under the patent laws of the United States, including but not limited to, monetary damages, including prejudgment interest and enhanced damages, based on Knowles' infringement;

(e) Find that Knowles' infringement of the '528 Patent, the '942 Patent, the '614 Patent, and the '140 Patent, is willful and that the damages to Analog be increased pursuant to 35 U.S.C. § 284 by three times the amount found or assessed;

(f) Find this to be an exceptional case, and award Analog its costs and reasonable attorneys' fees in respect thereto in accordance with 35 U.S.C. § 285; and

(g) Grant Analog such other relief as the Court deems just and equitable.

JURY DEMAND

In accordance with Rule 38(b) of the Federal Rules of Civil Procedure, Analog hereby demands a trial by jury on all issues so triable.

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