

a principal place of business at 5277 Trillium Boulevard, Hoffman Estates, Illinois 60192.

4. On information and belief, Defendant TESA SA is a corporation duly organized and existing under the laws of Switzerland and having a principal place of business at Bugnon 38, CH-1020, Renens, Switzerland. TESA SA manufactures precision measurement products, including probes and accessories for CMMs and machine tools. TESA SA operates as part of the Hexagon Metrology group of Hexagon AB, a Swedish company.

5. On information and belief, Defendant Hexagon Metrology, Inc. is a Delaware corporation that is licensed to do business in Illinois (with an agent in Chicago) and has a number of places of business, including, among others, 1558 Todd Farm Dr., Elgin, Illinois 60123, and 250 Circuit Drive, North Kingstown, Rhode Island 02852. Hexagon Metrology, Inc. also does business as TESA USA, Brown & Sharpe, Inc., and Sheffield Measurement, Inc. Hexagon Metrology, Inc. markets precision measurement products of TESA SA throughout the United States, including in this judicial district. Hexagon Metrology, Inc. operates as part of the Hexagon Metrology group of Hexagon AB, a Swedish company.

JURISDICTION AND VENUE

6. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. §271 *et. seq.*

7. Exclusive original jurisdiction over the subject matter of this action is conferred on this Court pursuant to 28 U.S.C. §§1331 and 1338(a).

8. Venue in this district is proper pursuant to 28 U.S.C. §§1391(b), (c) and (d), and 1400(b).

COUNT 1: PATENT INFRINGEMENT

9. Paragraphs 1-8 set forth above are incorporated by reference as though set forth here in full.

10. Renishaw plc is the sole owner of U.S. Patent No. 5,505,005 (the "005 Patent"), entitled "Touch Probe," which issued on April 9, 1996.

11. Renishaw plc is the sole owner of U.S. Patent No. 6,012,230 (the "230 Patent"), entitled "Inspection System for Coordinate Positioning Machine," which issued on January 11, 2000.

12. Renishaw plc is the sole owner of U.S. Patent No. 5,327,657 (the "657 Patent"), entitled "Touch Probe," which issued on July 12, 1994.

13. Renishaw plc manufactures products covered by the 005, 230, and 657 Patents (collectively "Renishaw Patents"). Renishaw, Inc. distributes those products in the United States.

14. Hexagon has infringed and is continuing to infringe the Renishaw Patents by making, using, offering to sell, and/or selling in the United States, and/or importing into the United States, products and/or methods that are encompassed by claims of the Renishaw Patents, by inducing others to infringe the Renishaw Patents, and/or by contributing to others' infringement of the Renishaw Patents. On information and belief, Hexagon will continue to infringe the Renishaw Patents unless and until enjoined by this Court.

15. Hexagon had prior knowledge of at least two of the Renishaw Patents, and therefore, on information and belief, has infringed one or more of the Renishaw Patents willfully, deliberately, and with objective recklessness, thereby rendering this case exceptional under the United States patent laws.

JURY DEMAND

Renishaw plc demands a trial by jury of all issues so triable, pursuant to Fed. R. Civ. P. 38.

PRAYER FOR RELIEF

WHEREFORE, Renishaw plc prays that this Court grant the following relief and judgment:

- A. A finding and judgment that Hexagon has infringed the Renishaw Patents;
- B. Preliminary and permanent injunctions against Hexagon, its officers, agents, servants, employees, and attorneys, and all others in active concert or participation with them who receive actual notice of such injunctions, from infringing, contributing to the infringement of, or inducing infringement of the Renishaw Patents, as well as all further and proper relief under 35 U.S.C. §283;
- C. An accounting of damages sustained by Renishaw plc by reason of Hexagon's infringement of the Renishaw Patents, including, but not limited to, Renishaw plc's lost profits, together with interest thereon, such damages to be trebled pursuant to 35 U.S.C. §284;
- D. An award to Renishaw plc (and assessment against Hexagon) of Renishaw plc's costs, disbursements and attorneys' fees for this action, including but not limited to those pursuant to 35 U.S.C. §285; and

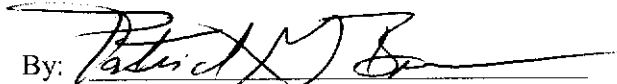
E. Such further relief as this Court deems just and appropriate.

Respectfully submitted,

RENISHAW PLC

Dated: June 18, 2008

By:



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