

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

GENERAL COMPONENTS, INC.,

Plaintiff,

v.

CKD USA CORPORATION,

Defendant.

Civil Action No. 1:11-cv-01580

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff General Components, Inc. ("GCI"), by counsel, complains of defendant CKD USA Corporation ("CKD"), as follows:

NATURE OF LAWSUIT

1. This is a suit for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code § 1 *et seq.* This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

PARTIES AND PATENTS

2. GCI is a company organized and existing under the laws of Maryland and having a principal business address at 9812 Falls Road # 114-296, Potomac, Maryland 20854.

3. GCI owns all right, title and interest in and has standing to sue for infringement of United States Patent No. 5,505,464 ("the '464 patent") entitled "Minimum Dead Volume Fitting," which issued on April 9, 1996. The '464 patent is attached hereto as Exhibit A and is incorporated herein by reference.

4. On February 8, 2011, the United States Patent and Trademark Office ("the PTO") issued an Ex Parte Reexamination Certificate ("the Reexamination Certificate"), which confirmed the patentability of claims 1-23 of the '464 patent and confirmed the patentability of,

and added, new claims 24-26. A copy of the Reexamination Certificate is attached hereto as Exhibit B and is incorporated herein by reference.

5. CKD is a corporation organized and existing under the laws of Illinois with a principle place of business at 4080 Winnetka Avenue, Rolling Meadows, Illinois 60008. CKD has committed acts of infringement in this judicial district and does regular business in this judicial district, including the manufacture and sale of products accused of infringement in this judicial district.

6. This Court has personal jurisdiction over CKD by virtue of its tortious acts of patent infringement which have been committed in the State of Illinois and in this judicial district, and by virtue of CKD's regular and systematic transaction of business in the State of Illinois.

VENUE

7. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(d) and 1400(b).

CKD'S ACTS OF PATENT INFRINGEMENT

8. CKD has infringed one or more claims of the '464 patent (including but not limited to claims 18, 19, 20, 25, and 26), through, among other activities, the manufacture, use, offer for sale, and/or sale of automated manufacturing products and components that either wholly utilize and/or induce and contribute to the use of face sealing fittings that employ the inventions of the claims of the '464 patent. By way of example and not limitation, CKD manufactures, uses, offers for sale, and/or sells the following products and/or components, each of which uses a "W seal" "seal connection method" that infringes at least claims 18, 29, 20, 25, and 26 of the '464 patent:

- integrated gas supply system Model No. IAGD4 including a 1.5-inch W seal
- regulator for process gas PGM Series including 1.125-inch and 1.5-inch W seals

- air operated valves MAGD4 for Model No. IAGD4 integrated gas supply system including W seals
- manual valves MOGD4 for Model No. IAGD4 integrated gas supply system including W seals
- flow adjusting valves MFGD4 for Model No. IAGD4 integrated gas supply system including W seals
- check valves MCGP4 for Model No. IAGD4 integrated gas supply system including W seals
- W seal gasket Model No. IAGD4-UGF-6.35GR for Model No. IAGD4 integrated gas supply system

9. CKD's infringement has injured GCI, and GCI is entitled to recover damages adequate to compensate it for such infringement, but in no event less than a reasonable royalty.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff GCI asks this Court to enter judgment against CKD and against its respective subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

- A. An award of damages adequate to compensate CKD for the infringement that has occurred, together with prejudgment interest from the date infringement of the '464 patent began;
- B. An award to GCI of all remedies available under 35 U.S.C. §§ 284 and 285; and,
- C. Such other and further relief as this Court or a jury may deem proper and just.

JURY DEMAND

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

Respectfully submitted,

Dated: March 7, 2011

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