

Joshua L. Raskin (*pro hac vice*)
Andrew P. Nemiroff
jraskin@wolfblock.com
WOLF BLOCK LLP
250 Park Avenue
New York, New York 10177
(212) 986-1116

Bobby Kasolas
bkasolas@wolfblock.com
WOLF BLOCK LLP
101 Eisenhower Pkwy
Suite 200
Roseland, NJ 07068-1067
(973) 228-5700

Attorneys for Plaintiffs
Bel Fuse, Inc., Bel Fuse, Ltd., Bel Fuse (Macau Commercial Offshore) Ltd.,
Bel Connector, Inc. and Bel Transformer, Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BEL FUSE, INC.,)	
BEL FUSE, LTD.,)	
BEL FUSE (MACAU COMMERCIAL)	Case No. 2:07-cv-02168-HHA-ES
OFFSHORE) LTD.,)	
BEL CONNECTOR, INC. and)	
BEL TRANSFORMER, INC.)	
)	
Plaintiffs,)	
)	
v.)	
)	
HALO ELECTRONICS, INC.,)	
)	
Defendant.)	

SECOND AMENDED COMPLAINT

Plaintiffs Bel Fuse, Inc., Bel Fuse, Ltd., Bel Fuse (Macau Commercial Offshore) Ltd.,
Bel Connector, Inc. and Bel Transformer, Inc. (collectively, “Bel Fuse”), by and through their
undersigned counsel, for their Second Amended Complaint against defendant, Halo Electronics

Inc. (“Halo”), allege the following upon information and belief, except as to those allegations concerning Bel Fuse, which are alleged upon knowledge.

THE PARTIES

1. Plaintiff Bel Fuse, Inc. is a corporation organized and existing under the laws of the State of New Jersey with its principal place of business at 206 Van Vorst Street, Jersey City, New Jersey.

2. Plaintiff Bel Fuse, Ltd. is a corporation organized and existing under the laws of Hong Kong with its principal place of business at 8/F 8 Luk Hop Street, Kowloon, Hong Kong. Bel Fuse, Ltd. is a subsidiary of Bel Fuse, Inc.

3. Plaintiff Bel Fuse (Macau Commercial Offshore) Ltd. is a corporation organized and existing under the laws of Macau with its principal place of business at Rua De Xangai No. 175, Edificio Da Associacao Commercial De Macau, 13 Andar H-K, Macau. Bel Fuse (Macau Commercial Offshore) Ltd. is a subsidiary of Bel Fuse, Inc.

4. Plaintiff Bel Connector, Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 11118 Susquehanna Trail South, Glen Rock, Pennsylvania. Bel Connector, Inc. is a subsidiary of Bel Fuse, Inc.

5. Plaintiff Bel Transformer, Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 500 Bayview Ave., Inwood, New York. Bel Transformer, Inc. is a subsidiary of Bel Fuse, Inc.

6. Defendant Halo Electronics, Inc. is a corporation organized and existing under the laws of the state of Nevada with its principal place of business at 1861 Landings Drive, Mountain View, California.

JURISDICTION AND VENUE

7. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 100 *et seq.* This Court has jurisdiction over the subject matter of the claim asserted herein pursuant to 28 U.S.C. §§ 1331 and 1338.

8. This Court has personal jurisdiction over Halo because Halo is doing business within this State and judicial district, transacts business within this State and judicial district, has sold and is selling allegedly infringing products into this State and judicial district, derives substantial revenue from intra-state commerce and is otherwise within the jurisdiction of this Court.

9. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and (c) because a substantial part of the events giving rise to the claims occurred in this district, Halo may be found in this judicial district, and Halo is subject to personal jurisdiction in this judicial district. Venue is also proper in this judicial district under 28 U.S.C. § 1400(b).

COUNT I
(Patent Infringement)

10. Bel Fuse restates and realleges the preceding paragraphs of this Complaint.

11. This claim arises under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*, including 35 U.S.C. § 271, and is for willful patent infringement.

12. On April 7, 1998, U.S. Patent No. 5,736,910 (“the ‘910 patent”) entitled, “Modular Jack Connector With A Flexible Laminate Capacitor Mounted On A Circuit Board,” was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the ‘910 patent is attached hereto as Exhibit A.

13. Plaintiffs Bel Fuse, Inc., Bel Fuse Ltd., Bel (Macau Commercial Offshore) Ltd., Bel Connector, Inc. and Bel Transformer, Inc. are the owners by assignment of all rights, title, and interest in and to the '910 patent and possess all rights of recovery under the '910 patent.

14. Halo has been and is infringing, actively inducing others to infringe, and/or contributing to the infringement of the '910 patent by, directly and/or through intermediaries, making, using, selling, offering for sale and/or importing products in the United States and this judicial district that are covered by one or more claims of the '910 patent, including but not limited to, Halo's FastJacks Integrated RJ-45 Connectors.

15. As a direct and proximate result of Halo's acts of infringement, Bel Fuse has suffered damages and is entitled to recover an amount adequate to compensate for the infringement under 35 U.S.C. § 284, which amount is to be determined at trial.

16. Halo has had, at all relevant times, actual and constructive notice that its conduct infringed on the claims of the '910 patent but nevertheless continued its infringing conduct. Halo's infringement has been, and continues to be, willful and, therefore, Bel Fuse is entitled to treble damages under 35 U.S.C. § 284.

17. This is an exceptional case under 35 U.S.C. § 285 which entitles Bel Fuse to an award of reasonable attorneys' fees.

18. Halo will continue infringing the '910 patent unless enjoined from further infringement by this Court.

PRAYER FOR RELIEF

WHEREFORE, Bel Fuse prays for judgment and relief as follows:

A. A judgment that Halo has infringed and continues to infringe claims of the '910 patent;

B. An order, pursuant to 35 U.S.C. § 283, permanently enjoining and restraining Halo and its officers, directors, principals, agents, servants, employees, successors and assigns, and all those in active concert or participation with each of the foregoing, from infringing, and from contributing to and/or inducing the infringement of, any claims of the '910 patent;

C. An order, pursuant to 35 U.S.C. § 284, that Halo account to Bel Fuse for an amount adequate to compensate Bel Fuse for damages sustained from Halo's infringing acts, which amount is to be determined, and that said amount be trebled pursuant to 35 U.S.C. § 284;

D. An order, pursuant to 35 U.S.C. § 285, that Halo pay Bel Fuse its reasonable attorneys' fees in connection with this action;

E. A judgment that costs of this action be awarded to Bel Fuse;

F. An order that Halo pay Bel Fuse prejudgment and post-judgment interest at the highest statutory rate on Bel Fuse's damages, costs and attorneys' fees; and

G. An order awarding Bel Fuse such other and further relief as may be deemed by this Court to be just and proper.

JURY DEMAND

Bel Fuse hereby demands trial by jury on all issues so triable.

Dated: January 6, 2009

WOLF BLOCK, LLP

By: s/ Andrew Nemiroff

Joshua L. Raskin (*pro hac vice*)

Andrew P. Nemiroff

jraskin@wolfblock.com

WOLF BLOCK LLP

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New York, New York 10177

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Attorneys for Plaintiffs

Bel Fuse, Inc., Bel Fuse, Ltd., Bel Fuse

(Macau Commercial Offshore) Ltd.,

Bel Connector, Inc. and Bel Transformer,

Inc.

CERTIFICATION OF SERVICE

I hereby certify that on January 6, 2009, I caused to be served a true and accurate copy of Plaintiff Bel Fuse, Inc.'s *Second Amended Complaint* on the following attorneys:

By Overnight Mail and Email:

Lanny S. Kurzweil
Irene M. Hurtado
McCarter & English, LLP
Four Gateway Center
100 Mulberry St.
Newark, NJ 07102

By Overnight Mail and Email:

Michael J. Kane
William R. Woodford
Sarah J. Bray
Fish & Richardson P.C.
3300 Dain Rauscher Plaza
60 South Sixth Street.
Minneapolis, MN 55402

By: Robin Brenner
Robin Brenner