

5. Venue in this judicial district is proper pursuant to 28 U.S.C. §§1391(b)-(c) and 1400(b).

6. Ansell is subject to personal jurisdiction in this district.

GENERAL ALLEGATIONS

7. Since 1999, Shen Wei has produced a line of enhanced moisturizing and therapeutic gloves. In the United States, Medline is the exclusive distributor of these enhanced gloves to healthcare facilities with certain limited exceptions.

8. Plaintiff Shen Wei is the owner of the entire right, title and interest in and to U.S. Patent No. 6,953,582 entitled “Skin-Enhancing Glove And Method Of Manufacture” (the “Shen Wei Patent” or “582 Patent”), a copy of which is attached hereto as Exhibit “A”.

9. The Shen Wei Patent was duly and legally issued to inventor Belle L. Chou (hereafter “Chou”) on October 11, 2005 (“the Date of Patent”), and Chou subsequently assigned to Plaintiff Shen Wei the entire right, title and interest in and to the Shen Wei Patent, including all rights to recover damages for all infringements thereof, including past infringements.

10. Upon information and belief, Ansell is in the business of making, using, selling, offering for sale and/or importing enhanced gloves, both under its own label and under private labels, that infringe claims 1-7, 13-16, 18, 22, 23, 26, 34-35, 45-46, and 49-50 of the Shen Wei Patent. Examples of infringing enhanced gloves include Ansell’s Micro-Touch NextStep™ gloves and the Encore Hydrasoft gloves.

11. Upon information and belief, Ansell, without Shen Wei’s authorization, is making, using, selling, offering for sale and/or importing its enhanced gloves that infringe claims 1-7, 13-16, 18, 22, 23, 26, 34-35, 45-46, and 49-50 of the Shen Wei Patent, and Ansell makes such gloves by a process patented in the United States in the Shen Wei Patent.

COUNT I

PATENT INFRINGEMENT

12. Plaintiffs reallege and incorporate by reference paragraphs 1-11 of this complaint.

13. Ansell, without Shen Wei's authorization, is infringing claims 1-7, 13-16, 18, 22, 23, 26, 34-35, 45-46, and 49-50 of the Shen Wei Patent by making, using, selling, offering for sale and/or importing enhanced gloves covered by the Shen Wei Patent and is making such gloves by a process patented in the United States in the Shen Wei Patent.

14. Ansell's infringement of the Shen Wei Patent is without license and with full knowledge of Plaintiffs' rights.

15. Plaintiffs have been damaged by Defendant's acts of infringement.

16. On information and belief, unless restrained and enjoined by this Court, Defendant will continue its acts of infringement and the resulting damages to Plaintiffs will be substantial, continuing and irreparable.

WHEREFORE, Plaintiffs pray that judgment be entered in their favor and against the Defendant, as follows:

A. That Ansell's enhanced gloves be declared infringing products under 35 U.S.C. § 271.

B. That Defendant and its officers, directors, employees, agents, licensees, servants, successors, subsidiaries, assigns and any and all persons acting in privity or in concert with them, be preliminarily and permanently enjoined and restrained, under 35 U.S.C. § 283, from infringing, contributing to infringement by others or inducing others to infringe claims 1-7, 13-16, 18, 22, 23, 26, 34-35, 45-46, and 49-50 of the Shen Wei Patent, including, without limitation, the sale, offer to sell, use, importation, advertising, transfer, disposal or promotion of

Defendant's enhanced gloves, or the aiding and abetting of any other persons' performance of these acts.

C. That damages pursuant to 35 U.S.C. § 284, together with prejudgment interest and costs, be awarded Plaintiffs against Defendant in an amount adequate to compensate Plaintiffs for Defendant's infringement of the Shen Wei Patent.

D. That the patent damages be increased to three times the amount awarded, as provided for under 35 U.S.C. § 284.

E. That the Court declare this to be an exceptional case and award Plaintiffs their attorneys fees pursuant to 35 U.S.C. § 285.

JURY DEMAND

Plaintiffs hereby demand a jury trial as provided by Rule 38(a) of the Federal Rules of Civil Procedure.

DATED: October 2, 2008

Respectfully submitted,

**SHEN WEI (USA) INC.
MEDLINE INDUSTRIES, INC.**

By: /s/Russell J. Genet
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CERTIFICATE OF SERVICE

The undersigned certifies that the **Plaintiffs' Second Amended Complaint** was filed electronically in compliance with the General Order on Electronic Case Filing, Section III(B)(1). As such, this document was served on all counsel who are deemed to have consented to electronic service. Fed. R. Civ. P. 5(b)(2)(D) and Local Rule 5.9.

/s/ Russell J. Genet
One of the Attorneys for Plaintiffs
SHEN WEI (USA) INC. and
MEDLINE INDUSTRIES, INC.