

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

Knowles Electronics, LLC,

Plaintiff,

v.

Analog Devices, Inc.,

Defendant.

Civil Action No. 1:11-cv-06804

Honorable Joan H. Lefkow

JURY TRIAL DEMANDED

FIRST AMENDED COMPLAINT

Plaintiff Knowles Electronics, LLC (“Knowles”), for its First Amended Complaint against Defendant Analog Devices, Inc. (“ADI”), states as follows:

PARTIES, JURISDICTION, AND VENUE

1. This action arises under the Patent Laws of the United States, United States Code, Title 35, § 1, et. seq. The Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338. Venue is proper in this district under 28 U.S.C. §§ 1391(b) and 1400(b) because the Defendant resides in this judicial district.

2. Knowles is a Limited Liability Company organized under the laws of the State of Delaware and having its principal offices in the city of Itasca, Illinois.

3. ADI is a Massachusetts Corporation registered to do business in the state of Illinois with a regular and established business and sales office located in Hoffman Estates, Illinois.

4. ADI has been and still is without authority using, selling, offering for sale and/or importing, whether alone or as part of an end product, microelectromechanical microphone packages that fall within the scope of the patent asserted below.

COUNT I: INFRINGEMENT OF U.S. PATENT NO. 8,018,049

5. Knowles re-alleges paragraphs 1–4 above, inclusive, which are incorporated by reference.

6. United States Patent No. 8,018,049, entitled “Silicon Condenser Microphone And Manufacturing Method” (hereinafter, “the ‘049 patent,” a copy of which is attached hereto as Exhibit 1), was duly and legally issued on September 13, 2011. Since that date Knowles has been and still is the owner of the ‘049 patent.

7. ADI has been and is now infringing one or more claims of the ‘049 patent by making, using, selling, offering to sell and/or importing miniature silicon microphones or such microphones made by the process of the claims of the ‘049 patent, including but not limited to its ADMP line of products further including, without limitation, the following model numbers: ADMP 401, 404, 405, 421, and 441.

8. Knowles has given ADI notice of its infringement of the ‘049 patent through at least the filing of the original complaint in this action, dated September 27, 2011.

9. Knowles has suffered damages as a result of the infringing activities of ADI, and will continue to suffer such damages as long as those infringing activities continue.

10. Said infringement has caused and will continue to cause irreparable harm to Knowles, unless and until such infringement is enjoined by this Court. Remedies at law are inadequate to compensate for that injury, with the balance of hardships between Knowles and ADI, and the public interest, warranting an injunction.

REQUEST FOR RELIEF

WHEREFORE, Knowles respectfully requests that the Court enter a judgment:

- A. Declaring that ADI has infringed and is continuing to infringe U.S. Patent No. 8,018,049.
- B. Permanently enjoining ADI, its subsidiaries, agents, officers, employees, directors, licensees, servants, successors, assigns and all others acting in privity or in concert with them, from infringing or inducing infringement of U.S. Patent No. 8,018,049.
- C. Awarding Knowles damages adequate to compensate for ADI's infringing activities, including supplemental damages for any post-verdict infringement up until entry of the final Judgment with an accounting as needed, together with prejudgment and post-judgment interest on the damages awarded.
- D. Awarding Knowles such other and further relief as the Court may deem just and proper.

JURY DEMAND

Plaintiff Knowles demands a trial by jury as to all claims and all issues properly triable thereby.

Dated: February 21, 2012

Respectfully submitted,

/s/Timothy Sendek

Allan J. Sternstein (asternstein@dykema.com)

Timothy K. Sendek (tsendek@dykema.com)

Dykema Gossett PLLC

10 South Wacker Drive

Suite 2300

Chicago, IL 60606

Telephone: (312) 876-1700

Facsimile: (312) 876-1155

Roderick R. McKelvie (rmckelvie@cov.com)

Sturgis M. Sobin (ssobin@cov.com) (*pro hac vice*)

Brian G. Bieluch (bbieluch@cov.com) (*pro hac vice*)

Paul J. Wilson (pwilson@cov.com) (*pro hac vice*)

David A. Garr (dgarr@cov.com) (*pro hac vice*)

Covington & Burling LLP

1201 Pennsylvania Avenue, N.W.
Washington, D.C. 20004-2401
Telephone: (202) 662-6000
Facsimile: (202) 662-6291

Counsel for Knowles Electronics, LLC

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