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Attorneys for Plaintiff PCT International, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

PCT International, Inc.

Plaintiff,

v.

Holland Electronics, LLC

Defendant.

Case No. _____

COMPLAINT

(Jury Trial Demanded)

Plaintiff PCT International, Inc. ("PCT") for its complaint against Defendant Holland Electronics, LLC ("Holland") states and alleges as follows:

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NATURE OF THE ACTION

1. This is an action for patent infringement arising under the patent laws of the United States, including 35 U.S.C. § 271 and §§ 281-285.

2. PCT is the owner, by assignment, of all right, title, and interest in United States Patent No. 6,042,422 (the “’442 Patent”) entitled “Coaxial cable end connector crimped by axial compression.” A true and exact copy of the ’442 Patent is attached as Exhibit A.

3. As set forth below, Holland has infringed and continues to infringe the ’442 Patent.

PARTIES, JURISDICTION AND VENUE

4. PCT is a corporation organized and existing under the laws of the state of Nevada, with its principal place of business located at 2260 W. Broadway Rd., Mesa Arizona, 85202. PCT is a developer, manufacturer and seller of innovative, high-quality, high-performance products for broadband communication networks, including coaxial cable connectors.

5. Upon information and belief, Holland is a corporation organized under the laws of the state of California, with its principal place of business located at 2935 Golf Course Drive, Ventura, California, 93003.

6. Holland makes, uses, offers to sell, sells and/or imports, directly and/or through its agents or distributors, infringing coaxial cable connectors under the model designations SLCU-6, SLCU-59, SLC6-BNC, SLC59-BNC, SLC6-RCA, and SLC59-RCA (collectively the “Accused Products”) throughout the United States, including, upon information and belief, in this judicial district.

7. This Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. §§ 1331 and 1338(a), in that this action arises under the federal patent statutes, 35 U.S.C. §§ 271 and 281-285.

8. This Court has personal jurisdiction over Holland because Holland’s actions establish such minimum contacts with Arizona that jurisdiction comports with the Arizona Long-Arm Statute and the United States Constitution.

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

FACTUAL BACKGROUND

10. PCT manufactures and sells a variety of coaxial cable connectors throughout the United States which embody the inventions disclosed in the ’442 Patent.

11. PCT has learned that Holland makes, uses, offers to sell, sells, and/or imports its Accused Products that infringe the ’442 Patent.

CLAIMS

INFRINGEMENT OF THE ’442 PATENT

12. PCT restates and realleges each of the allegations set forth above.

13. Holland has infringed and continues to infringe – directly, contributorily, and/or by active inducement the ’442 Patent by making, using, offering to sell, selling, and/or importing the Accused Products within the United States.

14. Holland’s actions have been without license or permission from PCT.

15. Holland’s infringement of the ’442 Patent has injured PCT, and will cause PCT further irreparable injury and damage in the future unless Holland is enjoined from such infringement.

16. Holland, on information and belief, had actual knowledge of the ’442 Patent, and has willfully, deliberately and intentionally infringed the claims of the ’442 Patent.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff PCT International, Inc. prays for entry of judgment against Defendant Holland Electronics, LLC as follows:

- a. Finding that Holland has infringed one or more claims of the ’442 Patent, either literally or under the doctrine of equivalents;

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- b. Enjoining Holland and its agents, servants, officers, directors, employees, affiliated companies and all persons in active concert with them, from further and continuing infringement of the '442 Patent;
- c. Ordering Holland to account for and pay to PCT the damages to which PCT is entitled as a consequence of the infringement, the precise amount of which shall be determined at trial;
- d. Ordering that such damages be trebled for the willful, deliberate and intentional infringement by Holland as alleged herein in accordance with 35 U.S.C. § 284;
- e. Ordering a post-judgment equitable accounting of damages for the period of infringement of the '442 Patent following the period of damages established by PCT at trial;
- f. Finding that this case is exceptional and awarding PCT its costs and attorneys' fees pursuant to 35 U.S.C. § 285;
- g. Awarding PCT prejudgment and post-judgment interest on all sums awarded together with costs and disbursements as allowed by law;
- h. Awarding such other and further relief as the Court deems PCT may be entitled to in law and equity.

JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, PCT respectfully requests a trial by jury of any and all issues on which a trial by jury is available under applicable law.

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Respectfully submitted,

DATED: August 21, 2012

By: /s/ Scott M. Bennett
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