

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

FILED

GENERAL COMPONENTS, INC.,

Plaintiff,

v.

MICRON TECHNOLOGY, INC.;

and

UNITED ELECTRIC CONTROLS
COMPANY;

and

SETRA SYSTEMS, INC.;

and

MOTT CORPORATION;

and

BRONKHORST USA, INC.;

Defendants.

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CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA

Civil Action No. 2:11cv152
(RGD/TEM)

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff General Components, Inc. ("GCI"), by and through its undersigned counsel,
alleges 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.*

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. On information and belief, Defendant Micron Technology, Inc. (“Micron”) is a corporation organized and existing under the laws of Delaware with a place of business at 9600 Godwin Drive, Manassas, Virginia 20110-4162 and conducts business in the State of Virginia, including within this district.

6. On information and belief, Defendant United Electric Controls Company (“UECC”) is a corporation organized and existing under the laws of Massachusetts with a place of business at 50 Seemans Lane, Milford, Connecticut 06460-4337 and conducts business in the State of Virginia, including within this district.

7. On information and belief, Defendant Setra Systems, Inc. (“Setra”) is a corporation organized and existing under the laws of Massachusetts with a place of business at 159 Swanson Road, Boxborough, Massachusetts 01719 and conducts business in the State of Virginia, including within this district.

8. On information and belief, Defendant Mott Corporation (“Mott”) is a corporation organized and existing under the laws of Connecticut with a place of business at 84 Spring Lane,

Farmington, Connecticut 06032 and conducts business in the State of Virginia, including within this district.

9. On information and belief, Defendant Bronkhorst USA, Inc. (“Bronkhorst”) is a corporation organized and existing under the laws of Delaware with a place of business at 57 South Commerce Way, Suite 120, Bethlehem, Pennsylvania 18017 and conducts business in the State of Virginia, including within this district. The Defendants identified in paragraphs 5-9 above are hereinafter referred to collectively as “Defendants.”

JURISDICTION

10. This Court has jurisdiction over the subject matter of this action under 28 U.S.C. §§ 1331 and 1338(a).

11. This Court has personal jurisdiction over Defendants.

VENUE

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

DEFENDANTS’ ACTS OF PATENT INFRINGEMENT

13. Defendants have 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 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, Defendants manufacture, use, offer for sale, and/or sell products and/or components that either (i) use “W seal” face seal connections or (ii) offer for sale and/or sell components of that are especially adapted for use in “W seal” face seal connections, that infringe at least claims 18, 29, 20, 25, and 26 of the ‘464 patent.

14. Defendants’ 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 Defendants and against their respective subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

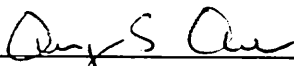
- A. An award of damages adequate to compensate GCI for the infringement that has occurred, together with prejudgment interest from the date infringement of the '464 patent began;
- B. An award to GCI of all remedies available under 35 U.S.C. §§ 284 and 285; and,
- C. Such other and further relief as 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 9, 2011



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