

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

Robertson Transformer Co. d/b/a Robertson
Worldwide,

Plaintiff,

v.

General Electric Company,
GE Lighting, LLC,
H. B. Etlin Company, Ltd. a/k/a Etlin-Daniels,
ARN Industries, Inc. d/b/a Halco Lighting
Technologies,
Hatch Transformers, Inc.,
Howard Industries Inc., and
Keystone Technologies, LLC,

Defendants.

Civil Action _____

JURY TRIAL DEMANDED

ORIGINAL COMPLAINT

This is an action for patent infringement in which Plaintiff Robertson Transformer Co. d/b/a as Robertson Worldwide (“Robertson”) makes the following allegations against Defendants General Electric Company, GE Lighting, LLC, (collectively, “GE”), H. B. Etlin Company, Ltd. a/k/a Etlin-Daniels (“Etlin”), ARN Industries, Inc. d/b/a Halco Lighting Technologies (“Halco”), Hatch Transformers, Inc. (“Hatch”), Howard Industries Inc. (“Howard”) and Keystone Technologies, LLC (“Keystone”); (collectively, “Defendants”):

THE PARTIES

1. Plaintiff Robertson Transformer Co. d/b/a Robertson Worldwide is an Illinois corporation with a principal place of business in Blue Island, Illinois.
2. On information and belief, defendant General Electric Company is a New York corporation having its principal place of business located at 3135 Easton Turnpike, Fairfield, CT 06828. General Electric Company may be served via its designated agent for service of process,

the Secretary of State of New York. The post office address to which the New York Secretary of State shall mail a copy of process served upon it is Senior Litigation Counsel, General Electric Company, 3135 Easton Turnpike, Fairfield, CT 06828.

3. On information and belief, defendant GE Lighting is a General Electric Company affiliate, and a Delaware Limited Liability Company having its principal place of business located at 1975 Noble Road, East Cleveland, OH 44112. GE Lighting may be served via its registered agent for service of process, The Corporation Trust Company, 1209 Orange Street, Wilmington, DE 19801. GE Lighting is owned by General Electric Company.

4. On information and belief, defendant H. B. Etlin Company, Ltd., a/k/a Etlin-Daniels is a Canadian business entity having its principal place of business located at 1850 Wilson Avenue, Toronto, Ontario, M9M 1A1, Canada, and has an office in the United States located at 1808 Windsor Drive, High Point, NC 27262. H. B. Etlin Company, Ltd. may be served through its CEO, David Etlin, at 1850 Wilson Avenue, Toronto, Ontario, Canada.

5. On information and belief, defendant ARN Industries, Inc. d/b/a Halco Lighting Technologies is a Georgia corporation having its principal place of business located at 2940-A Pacific Drive, Norcross, GA 30071. ARN Industries, Inc. d/b/a Halco Lighting Technologies may be served via its registered agent for service of process, Michael Rosenthal, 5855 Sandy Springs Circle, Suite 300, Atlanta, GA 30328.

6. On information and belief, defendant Hatch Transformers, Inc. is a Florida corporation having its principal place of business in Tampa, Florida. Hatch Transformers, Inc. may be served via its registered agent for service of process, Michael L. Hatch, at 5212 W. Neptune Way, Tampa, FL 33629.

7. On information and belief, defendant Howard Industries Inc. is a Mississippi corporation having its principal place of business located at 36 Howard Drive, Ellisville, MS 39437. Howard Industries Inc. may be served via its registered agent for service of process, Richard L. Yoder, at 415 N. Magnolia Street, Suite 400, Laurel, MS 39441.

8. On information and belief, defendant Keystone Technologies, LLC is a Pennsylvania limited liability company having its principal place of business located at 400 Foothill Drive, Blue Bell, PA 19422. Keystone Technologies, LLC may be served via its President, Frederick M. Greenberg, at 593 East Skippack Pike, Fort Washington, PA 19034.

JURISDICTION, VENUE AND JOINDER

9. This action arises under the patent laws of the United States, and this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). Subject matter jurisdiction is also proper in this Court pursuant to 28 U.S.C. § 1332. There is diversity of citizenship between the parties, and the amount in controversy, excluding interests and costs, is in excess of the jurisdictional minimum of this Court.

10. This Court has personal jurisdiction over the Defendants. The Defendants have conducted extensive commercial activities and continue to conduct extensive commercial activities within the State of Illinois. The Defendants, directly and/or through intermediaries or affiliates (including subsidiaries, distributors, sales agents, and others), offer for sale, sell, and/or advertise their products (including, but not limited to, the products that are accused of infringement in this lawsuit) in the United States, the State of Illinois, and this Judicial District. The Defendants (directly and/or through intermediaries or affiliates, including subsidiaries, distributors, sales agents, and others) have purposefully and voluntarily placed one or more of their products (including, but not limited to, the products that are accused of infringement in this lawsuit), into the stream of commerce with the expectation that they will be purchased by

customers in the Northern District of Illinois. Accordingly, the Defendants have committed the tort of patent infringement within the State of Illinois, and this Judicial District, as alleged in more detail below.

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

12. Joinder of the Defendants in this action is proper pursuant to 35 U.S.C. § 299. As alleged in more detail below (including without limitation paragraphs 31-34), all of the Defendants are importing, offering to sell and/or selling many of the same infringing products, and questions of fact common to all Defendants will arise in this action.

THE PATENTS-IN-SUIT

United States Patent No. 6,420,838 (“the Shackle patent”)

13. On July 16, 2002, United States Patent No. 6,420,838 (“the Shackle patent”), entitled “Fluorescent Lamp Ballast With Integrated Circuit,” was duly and legally issued to inventor Peter W. Shackle by the United States Patent and Trademark Office, after a full and fair examination. Plaintiff Robertson Worldwide was assigned the Shackle patent, and it continues to hold all rights, title, and interest in the Shackle patent. A true and correct copy of the Shackle patent is attached as Exhibit A to the Complaint.

14. The Shackle patent discloses and claims novel methods and apparatuses for fluorescent lamp ballasts with protection against: significant rectification of lamp voltage, excessive lamp voltage, and low line voltage. By way of example only, Claim 19 recites one of the inventions disclosed in the Shackle patent:

- (19) A gas discharge lamp ballast with protection against all three of significant rectification of lamp voltage, excessive lamp voltage and low line voltage, comprising:
 - (a) a resonant load circuit for at least one lamp, including a DC blocking capacitor connected between a reference node and the at least one lamp;

- (b) a switching arrangement including first and second switches serially connected between a rail node at a DC potential and the reference node, for supplying AC current to the load via a midpoint node between the first and second switches;
- (c) an integrated circuit including:
 - (i) a driver for the switching arrangement including control means to create a frequency sweep from a pre-heat frequency, through a substantially lower, resonant frequency, to a still lower operating frequency;
 - (ii) a pre-heat pin for triggering the control means to re-start a frequency sweep in response to a re-start signal that exceeds a threshold level;
 - (iii) a shut-down pin associated with an internal shutdown latch for shutting down the driver in response to a shut-down signal that exceeds a threshold level; and
 - (iv) a pin at a preset voltage during normal operation and whose impedance to the reference node determines frequency of operation of the switching arrangement;
- (d) a first protection circuit for comparing a first voltage representing an average voltage on the midpoint node with a second voltage representing the voltage of the DC blocking capacitor, and for sending a shut-down signal to the shut-down pin when one of the first and second voltages exceeds the other by respective predetermined amounts;
- (e) a second protection circuit having an output coupled to the pre-heat pin for detecting a brief period of substantially excessive lamp voltage when a lamp has not yet started in response to current spikes through a switch of the switching arrangement and, in turn, for supplying the pre-heat pin with a re-start signal;
- (f) a third protection circuit for detecting a longer period of less excessive lamp voltage; the third protection circuit including a DC amplifier with a response time substantially longer than the brief period for amplifying a signal representing the output of the second protection circuit and providing the resulting signal to the shutdown pin;
- (g) the first and third protection circuits sharing an auxiliary circuit that prevents each of them from continually sending a shut-down signal to the shut-down pin; and

- (h) a fourth protection circuit for lowering the mentioned impedance when a voltage representing the magnitude of an AC input voltage falls below the mentioned preset voltage by a predetermined amount.

United States Patent No. 6,366,032 (“the Allison/Moore patent”)

15. On April 2, 2002, United States Patent No. 6,366,032 (“the Allison/Moore patent”), entitled “Fluorescent Lamp Ballast With Integrated Circuit,” was duly and legally issued to co-inventors Joseph M. Allison and David J. Moore by the United States Patent and Trademark Office, after a full and fair examination. Plaintiff Robertson Worldwide was assigned the Allison/Moore patent, and it continues to hold all rights, title, and interest in the Allison/Moore patent. A true and correct copy of the Allison/Moore patent is attached as Exhibit B to the Complaint.

16. The Allison/Moore patent discloses and claims novel methods and apparatuses for fluorescent lamp ballasts incorporating innovative circuitry for use with low-cost integrated circuits effective for ballast shutdown at lamp end-of-life, automatic resetting of the ballast when a lamp is replaced, and limiting the number of attempts to start the lamp. By way of example only, Claim 1 recites one of the inventions disclosed in the Allison/Moore patent:

(1) A fluorescent lamp ballast, comprising:

- (a) a load circuit for at least one lamp, including a resonant inductance and a resonant capacitance for setting a resonant frequency of the circuit;
- (b) a half-bridge switching arrangement for supplying AC current to the load,
- (c) an integrated circuit comprising:
 - (i) a driver for the half-bridge arrangement including control means to create a frequency sweep from a pre-heat frequency, through a substantially lower, resonant frequency, to a still lower operating frequency;

- (ii) a pre-heat pin for triggering the control means to re-start a frequency sweep in response to a first signal exceeding a first threshold level,
 - (iii) a shut-down pin associated with an internal shutdown latch for shutting down the driver in response to a second signal exceeding a second threshold level; and
 - (iv) a power-supply pin for power the integrated circuit; and
- (d) pre-heat trigger circuitry to detect a current spike through switches of the half-bridge switching arrangement when the lamp has not yet started and, in response, to supply the pre-heat pin with a first signs exceeding the first threshold level;
 - (e) end-of-life circuitry for providing to the shut-down pin a second signal exceeding the second threshold level if lamp current fails to reach a substantial portion of its normal level within a predetermined period of time; and
 - (f) a DC current-supply path from a DC current supply, through at least one filament of each lamp in the load circuit, to the power-supply pin;
 - (g) the end-of-life circuitry cooperating with the pre-heat trigger circuitry by limiting the number of the frequency sweeps to no more than occur during the predetermined period of time set by the end-of-life circuitry; and
 - (h) the DC current-supply path cooperating with the end-of-life circuitry and the internal shut-down latch to reset the latch when the DC current-supply path is broken due to absence of the at least one filament in the path.

FACTUAL BACKGROUND

Robertson's Inventors Develop Novel Electronic Ballasts for Fluorescent Lamps

17. The company known today as Robertson Worldwide was founded in 1948 by Robert Irwin Robertson. In 1954, Mr. Robertson moved his company to its present facility in Blue Island, Illinois. From the time of its founding through the mid-1980s, Robertson Worldwide primarily focused on the development and production of magnetic ballasts that operate linear fluorescent lamps. In the mid-1980s, compact fluorescent lamps (CFLs) started to

become popular based on their energy savings. Robertson established a dominant position in the market for magnetic ballasts that operate CFLs and became a highly successful company.

18. Electronic ballasts first emerged in the 1980s, but the early electronic ballasts were unreliable, with high failure rates and at far greater expense than magnetic ballasts. As a result, the transition of the marketplace from magnetic to electronic ballasts moved slowly. Use of electronic ballasts started to take off in the early 1990s, with industry sales increasing approximately twenty times between 1990 and 1995. During that time period, the vast majority of electronic ballasts operated linear fluorescent lamps.

19. In the late-1990s, Robertson began developing its own electronic ballasts in-house. In the 1998-1999 time frame, Robertson hired two electrical engineers, Mr. Joseph M. Allison and Mr. David J. Moore, as its primary electrical engineering staff for the in-house development of electronic ballasts. In 2000, Robertson hired Dr. Shackle as Vice President of Engineering. Dr. Shackle served as Robertson's primary electronic ballast technologist. Based on the extensive research and development that Robertson invested in its in-house development of industry-changing electronic ballasts, Robertson filed the patent application that matured into the Allison/Moore patent on January 28, 2000, and filed the application that matured into the Shackle patent on March 8, 2001.

20. Dr. Peter W. Shackle is the inventor of the inventions disclosed and claimed in the Shackle patent. Dr. Shackle earned a Bachelor of Science degree in Physics from the University of Birmingham (United Kingdom). He graduated with first class honors and was awarded the Smith Prize as the top ranked Physics student in the University. Dr. Shackle earned his Ph.D. in Physics from the University of Cambridge. He was Vice President of Engineering at Robertson from 2000 to 2002, and during that time he worked on the inventions that resulted in the Shackle

patent. Dr. Shackle has spent decades researching and developing technology for electronic ballasts and LED drivers. He has held the positions of Vice President at Universal Lighting Technologies and Fulham Lighting, and was the Chief Technology Officer of Lightech Electronics. Dr. Shackle is an inventor on 55 United States patents.

21. Mr. Joseph M. Allison is a co-inventor of the inventions disclosed and claimed in the Allison/Moore patent. He is a Registered Professional Engineer, and earned both a Bachelor of Science and a Master's degree in Electrical Engineering from Gannon University. From 1998 through 2000, Mr. Allison served as one of the primary electrical engineers that developed electronic ballasts in-house at Robertson. During that time, he worked on the inventions that resulted in the Allison/Moore patent. In addition to his work on electronic ballasts, Mr. Allison was a contributing designer of the electrical power system for a NASA spacecraft. Mr. Allison is an inventor on more than 20 United States patents.

22. Mr. David J. Moore is a co-inventor of the inventions disclosed and claimed in the Allison/Moore patent. He earned a Bachelor of Science in Electrical Engineering from the DeVry Institute of Technology. From 1999 through 2000, Mr. Moore served as one of the primary electrical engineers that developed electronic ballasts in-house at Robertson. During that time, he worked on the inventions that resulted in the Allison/Moore patent. In addition to his work at Robertson, Mr. Moore has worked as a senior engineer at Motorola, LG Industrial Systems, Microsun Technologies and Philips Lighting.

23. Based on the innovative work of Robertson's inventors and the company's significant investment in product development based on those inventions, in 2001-2002, Robertson began producing electronic ballasts for fluorescent lamps that employ the technology disclosed and claimed in both the Allison/Moore patent and the Shackle patent. These multi-

voltage products had the highest level of safety for electronic ballast applications in the industry. Robertson’s electronic ballasts safeguard against open lamp filaments, high temperature, damaged lamps, lamp rectification, high lamp voltage, and low line voltage.

24. Between 2001 and the present, Robertson invested substantial time and money researching, developing, and selling electronic ballasts for a number of different styles of lamps that employ the technology disclosed and claimed in the Allison/Moore patent and the Shackle patent. Robertson’s electronic ballasts that use the technology claimed in the patents-in-suit can be divided into groups based on the types of lamps the ballasts operate. For example, one group of Robertson electronic ballasts covered by the patents-in-suit is used to operate 1 or 2 compact fluorescent lamps, ranging from 13 watts to 26 watts. Another group of Robertson electronic ballasts covered by the patents-in-suit are used to operate 1 or 2 compact fluorescent lamps, ranging from 32 to 42 watts. A third group of electronic ballasts covered by Robertson’s patents-in-suit are used to operate 1 to 4 T5 linear fluorescent lamps ranging from 24 to 54 watts.

25. The following chart identifies Robertson product numbers that employ the technology claimed in the Allison/Moore and Shackle patents, and which currently compete against or did compete against one or more of the Defendants’ infringing electronic ballasts.

<u>CFL Electronic Ballasts</u> (1 or 2 lamps; 13 to 26 watts)	<u>CFL Electronic Ballasts</u> (1 or 2 lamps; 32 to 42 watts)	<u>T5 Linear Fluorescent Electronic Ballasts</u> (1 to 4 lamps; 24 to 54 watts)
All variants of PSM213, PSM218, PSM226	All variants of PSP242	All variants of PST 135, PST139, PST154, PSA224, PST224, PST228, PSA228, PSV228, PSA239, PSV239, PSA254, PSV254, PSB454, PSY454

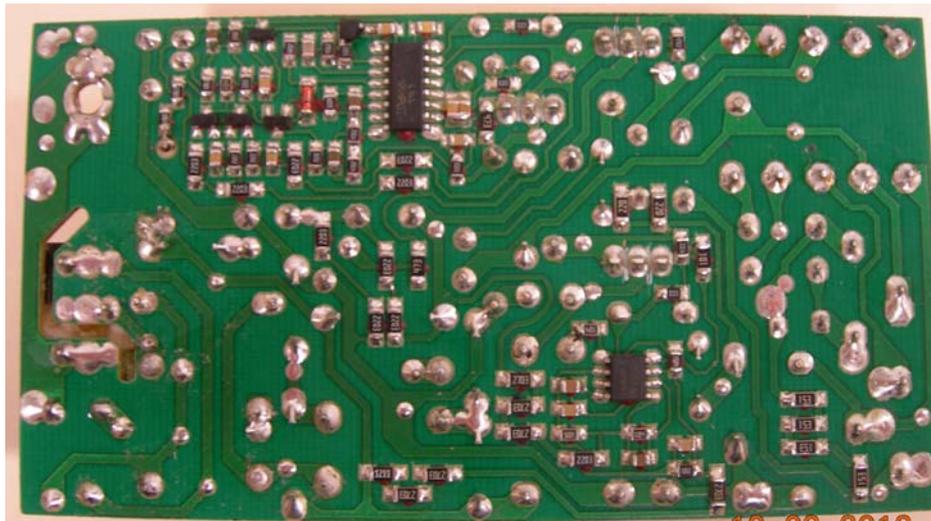
26. The photograph below depicts a top view of the circuit board for a Robertson PSM226 electronic ballast:

TOP VIEW



27. The photograph below depicts a bottom view of the circuit board for a Robertson PSM226 electronic ballast:

BOTTOM VIEW



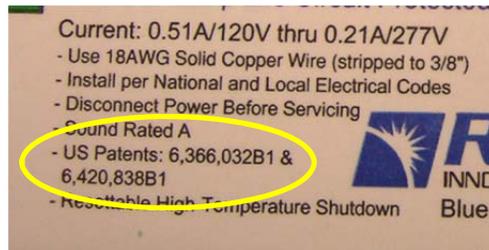
28. Robertson's electronic ballasts identified in paragraph 25 have been substantially and continuously marked with the Allison/Moore patent number (6,366,032) and the Shackleton patent number (6,420,838) on its products and product specification sheets. The below

photographs of a Robertson PSM226 illustrate an example of Robertson’s patent marking on its products:

Photo of Robertson PSM226



Close-up of Yellow Area Circled Above



29. After its significant investment in research, development, and intellectual property protection, Robertson has lost profits from sales that it would have made as a result of the Defendants’ infringing sales of products that directly compete with Robertson’s marked electronic ballasts.

30. In addition, Robertson has lost profits from price erosion resulting from Defendants’ infringing sales of products that directly compete with Robertson’s marked electronic ballasts.

**Defendants Import, Offer to Sell and Sell the Same Electronic Ballasts
That Infringe Robertson’s Allison/Moore Patent and Shackle Patent**

31. All six Defendants offer to sell and sell infringing electronic ballasts that are originally imported from the same foreign manufacturer. The common manufacturer of Defendants’ infringing electronic ballasts is a Chinese-based company known as Century Concepts Limited (“CCL” or “Century Concepts”). Century Concepts has manufacturing facilities for the production and assembly of electronic ballasts located in the Shenzhen region of China. Century Concepts manufactures all of the accused electronic ballasts sold by the Defendants. Moreover, for each of the Defendants, Century Concepts manufactures the same electronic ballasts that operate 26 and 42 watt CFLs.

32. The Defendants’ infringing electronic ballasts that are manufactured by their common supplier (Century Concepts) contain labeling on the circuit boards in the form of numbers that identify the ballasts as Century Concepts-manufactured products. Thus, the Defendants’ infringing electronic ballasts are each individually marked with specific circuit board numbers that are unique to Century Concepts. The Century Concepts circuit board identification numbers differ based on ballast type, such that the ballasts operating 13 to 26 watt CFLs, 14 to 54 watt T5 linear fluorescents, and 32 to 42 watt CFLs have distinct circuit board numbers that begin with the prefix “550-2”, “550-4”, or “C-”, respectively. The circuit board identification numbers change over time to reflect chronological revisions made to the circuit board.

33. All of the Defendants have imported the same Century Concepts-manufactured infringing electronic ballasts for operation of 26 watt CFLs. The table on the following page shows the product number each Defendant uses to offer to sell and sell the same infringing Century Concepts-manufactured electronic ballasts for 26 watt CFLs:

GE's 26 watt Product No. made by CCL	Etlin's 26 watt Product No. made by CCL	Halco's 26 watt Product No. made by CCL	Hatch's 26 watt Product No. made by CCL	Howard's 26 watt Product No. made by CCL	Keystone's 26 watt Product No. made by CCL
GEC226-MVPS	EB-226-UV-TP-PSD	EP2CF26PS	HC226PS	EP2/26CF	KTEB-226-UV-TP-PSD

34. All of the Defendants have also imported the same Century Concepts-manufactured infringing electronic ballasts for operation of 42 watt CFLs. The following tables show the product number each Defendant uses to offer to sell and sell the same infringing Century Concepts-manufactured electronic ballasts for 42 watt CFLs:

GE's 42 watt Product No. made by CCL	Etlin's 42 watt Product No. made by CCL	Halco's 42 watt Product No. made by CCL	Hatch's 42 watt Product No. made by CCL	Howard's 42 watt Product No. made by CCL	Keystone's 42 watt Product No. made by CCL
GEC242-MVPS	EB-242-UV-TP-PSD	EP2/CF42PS/MV	HC242PS	EP2/42CF/MV	KTEB-242-UV-TP-PSD

COUNT I

Infringement of the Shackle Patent – GE

35. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

36. GE has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Shackle patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Shackle patent, specifically including the following products containing

Century Concepts' circuit board numbers (and all variants of same): GEC213-MVPS, GEC218-MVPS, GEC226-MVPS, GEC242-MVPS. GE is thus liable for direct infringement of the Shackle patent pursuant to 35 U.S.C. § 271(a).

37. On information and belief, GE knowingly and falsely marked several of its infringing electronic ballasts as “designed...by General Electric Co.” – when in fact it knew such ballasts were not designed by General Electric Co.

38. The following screenshot is a top view of the circuit board for an infringing GE electronic ballast that operates a 26 watt CFL:



GEC226-MVPS

39. On information and belief, GE has infringed and is infringing the Shackle patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its ballasts and

specification sheets with the Shackle patent number and GE cross-references Robertson's products in its marketing literature. On information and belief, GE likewise has knowledge that its accused products infringe the Shackle patent. GE's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

40. Robertson has suffered and continues to suffer damages as a result of GE's infringement of the Shackle patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from GE for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for GE's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

41. GE's infringement of the Shackle patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless GE is enjoined by this Court.

COUNT II

Infringement of the Allison/Moore Patent – GE

42. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

43. GE has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Allison/Moore patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Allison/Moore patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): GEC213-MVPS, GEC218-MVPS, GEC226-MVPS, GEC242-MVPS. GE is thus liable for direct infringement of the Allison/Moore patent pursuant to 35 U.S.C. § 271(a).

44. On information and belief, GE knowingly and falsely marked several of its infringing electronic ballasts as “designed...by General Electric Co.” – when in fact it knew such ballasts were not designed by General Electric Co.

45. On information and belief, GE has infringed and is infringing the Allison/Moore patent with knowledge of Robertson’s patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its ballasts and specification sheets with the Allison/Moore patent number and GE cross-references Robertson’s marked products in its marketing literature. On information and belief, GE likewise has knowledge that its accused products infringe the Allison/Moore patent. GE’s acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson’s patent rights.

46. Robertson has suffered and continues to suffer damages as a result of GE’s infringement of the Allison/Moore patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from GE for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for GE’s acts of willful patent infringement pursuant to 35 U.S.C. § 284.

47. GE’s infringement of the Allison/Moore patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless GE is enjoined by this Court.

COUNT III

Infringement of the Shackle Patent – ETLIN

48. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

49. Etlin has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Shackle patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Shackle patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): EB-226-UV-TP-PSD, EB-242-UV-TP-PSD, EB-239HO-UV-TP-PS, EB-254HO-UV-TP-PS, EB-454HO-UV-TP-PS. Etlin is thus liable for direct infringement of the Shackle patent pursuant to 35 U.S.C. § 271(a).

50. In addition, on information and belief, Etlin has infringed and is infringing the Shackle patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Shackle patent number. On information and belief, Etlin likewise has knowledge that its accused products infringe the Shackle patent. Etlin's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

51. Robertson has suffered and continues to suffer damages as a result of Etlin's infringement of the Shackle patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Etlin for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Etlin's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

52. Etlin's infringement of the Shackle patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Etlin is enjoined by this Court.

COUNT IV

Infringement of the Allison/Moore Patent – ETLIN

53. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

54. Etlin has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Allison/Moore patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Allison/Moore patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): EB-226-UV-TP-PSD, EB-242-UV-TP-PSD, EB-239HO-UV-TP-PS, EB-254HO-UV-TP-PS, EB-454HO-UV-TP-PS. Etlin is thus liable for direct infringement of the Allison/Moore patent pursuant to 35 U.S.C. § 271(a).

55. In addition, on information and belief, Etlin has infringed and is infringing the Allison/Moore patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Allison/Moore patent number. On information and belief, Etlin likewise has knowledge that its accused products infringe the Allison/Moore patent. Etlin's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

56. Robertson has suffered and continues to suffer damages as a result of Etlin's infringement of the Allison/Moore patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Etlin for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Etlin's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

57. Etlin's infringement of the Allison/Moore patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Etlin is enjoined by this Court.

COUNT V

Infringement of the Shackle Patent – HALCO

58. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

59. Halco has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Shackle patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Shackle patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): EP2CF13PS, EP2CF18PS, EP2CF26PS, EP2CF42PS, EP228/PS/MV, EP239HO/PS/MV, EP254HO/PS/MV. Halco is thus liable for direct infringement of the Shackle patent pursuant to 35 U.S.C. § 271(a).

60. The following screenshot is a top view of the circuit board for an infringing Halco electronic ballast that operates a 26 watt CFL:



EP2CF26PS

61. On information and belief, Halco has infringed and is infringing the Shackle patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Shackle patent number. On information and belief, Halco likewise has knowledge that its accused products infringe the Shackle patent. Halco's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

62. Robertson has suffered and continues to suffer damages as a result of Halco's infringement of the Shackle patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Halco for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Halco's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

63. Halco's infringement of the Shackle patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Halco is enjoined by this Court.

COUNT VI

Infringement of the Allison/Moore Patent – HALCO

64. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

65. Halco has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Allison/Moore patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Allison/Moore patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): EP2CF13PS,

EP2CF18PS, EP2CF26PS, EP2CF42PS, EP228/PS/MV, EP239HO/PS/MV, EP254HO/PS/MV.

Halco is thus liable for direct infringement of the Allison/Moore patent pursuant to 35 U.S.C. § 271(a).

66. In addition, on information and belief, Halco has infringed and is infringing the Allison/Moore patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Allison/Moore patent number. On information and belief, Halco likewise has knowledge that its accused products infringe the Allison/Moore patent. Halco's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

67. Robertson has suffered and continues to suffer damages as a result of Halco's infringement of the Allison/Moore patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Halco for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Halco's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

68. Halco's infringement of the Allison/Moore patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Halco is enjoined by this Court.

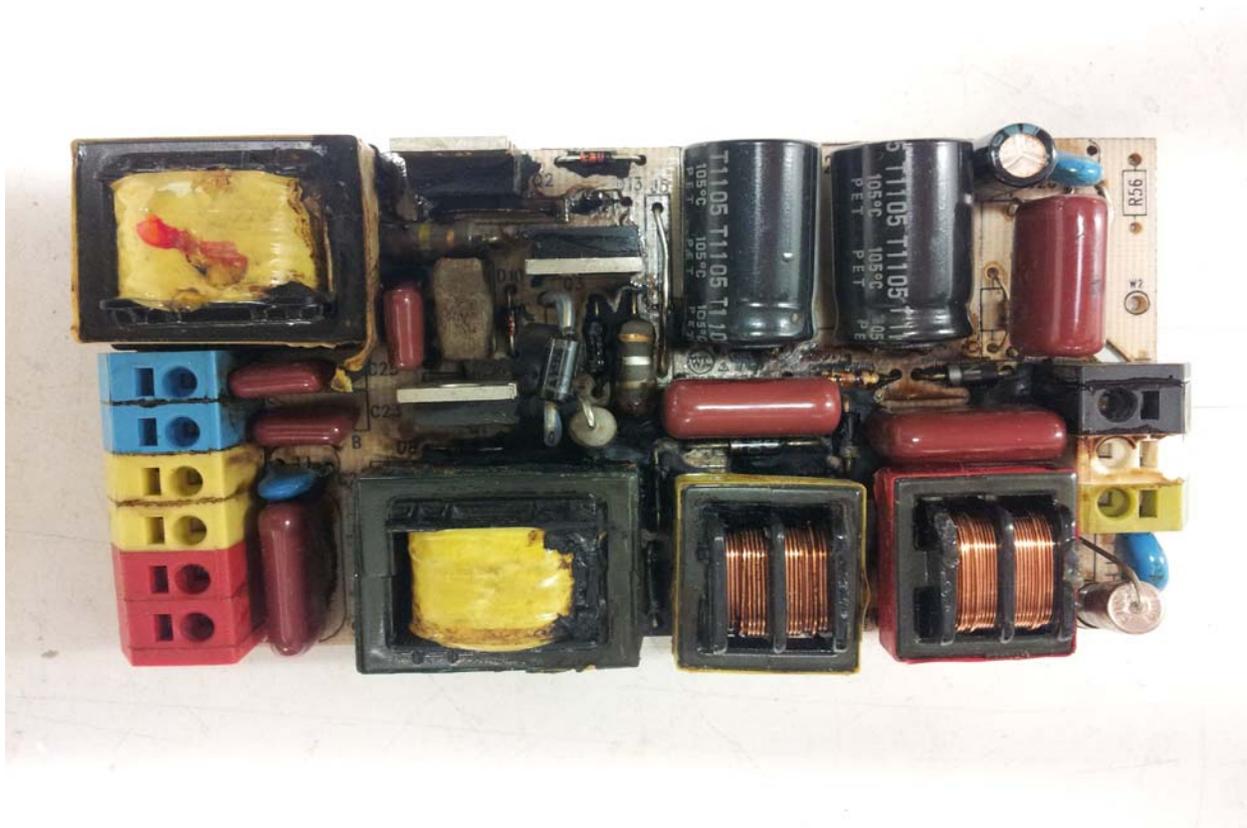
COUNT VII

Infringement of the Shackle Patent – HATCH

69. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

70. Hatch has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Shackle patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Shackle patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): HC213PS, HC218PS, HC226PS, HC242PS, HL224HO/PS/UV, HL228HE/PS/UV, HL239HO/PS/UV, HL254HO/PS/UV, HL454HO/PS/UV. Hatch is thus liable for direct infringement of the Shackle patent pursuant to 35 U.S.C. § 271(a).

71. The following screenshot is a top view of the circuit board for an infringing Hatch electronic ballast that operates a 26 watt CFL:



HC226PS

72. On information and belief, Hatch has infringed and is infringing the Shackle patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Shackle patent number. On information and belief, Hatch likewise has knowledge that its accused products infringe the Shackle patent. Hatch's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

73. Robertson has suffered and continues to suffer damages as a result of Hatch's infringement of the Shackle patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Hatch for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Hatch's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

74. Hatch's infringement of the Shackle patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Hatch is enjoined by this Court.

COUNT VIII

Infringement of the Allison/Moore Patent – HATCH

75. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

76. Hatch has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Allison/Moore patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Allison/Moore patent, specifically including the following products

containing Century Concepts' circuit board numbers (and all variants of same): HC213PS, HC218PS, HC226PS, HC242PS, HL224HO/PS/UV, HL228HE/PS/UV, HL239HO/PS/UV, HL254HO/PS/UV, HL454HO/PS/UV. Hatch is thus liable for direct infringement of the Allison/Moore patent pursuant to 35 U.S.C. § 271(a).

77. In addition, on information and belief, Hatch has infringed and is infringing the Allison/Moore patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Allison/Moore patent number. On information and belief, Hatch likewise has knowledge that its accused products infringe the Allison/Moore patent. Hatch's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

78. Robertson has suffered and continues to suffer damages as a result of Hatch's infringement of the Allison/Moore patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Hatch for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Hatch's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

79. Hatch's infringement of the Allison/Moore patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Hatch is enjoined by this Court.

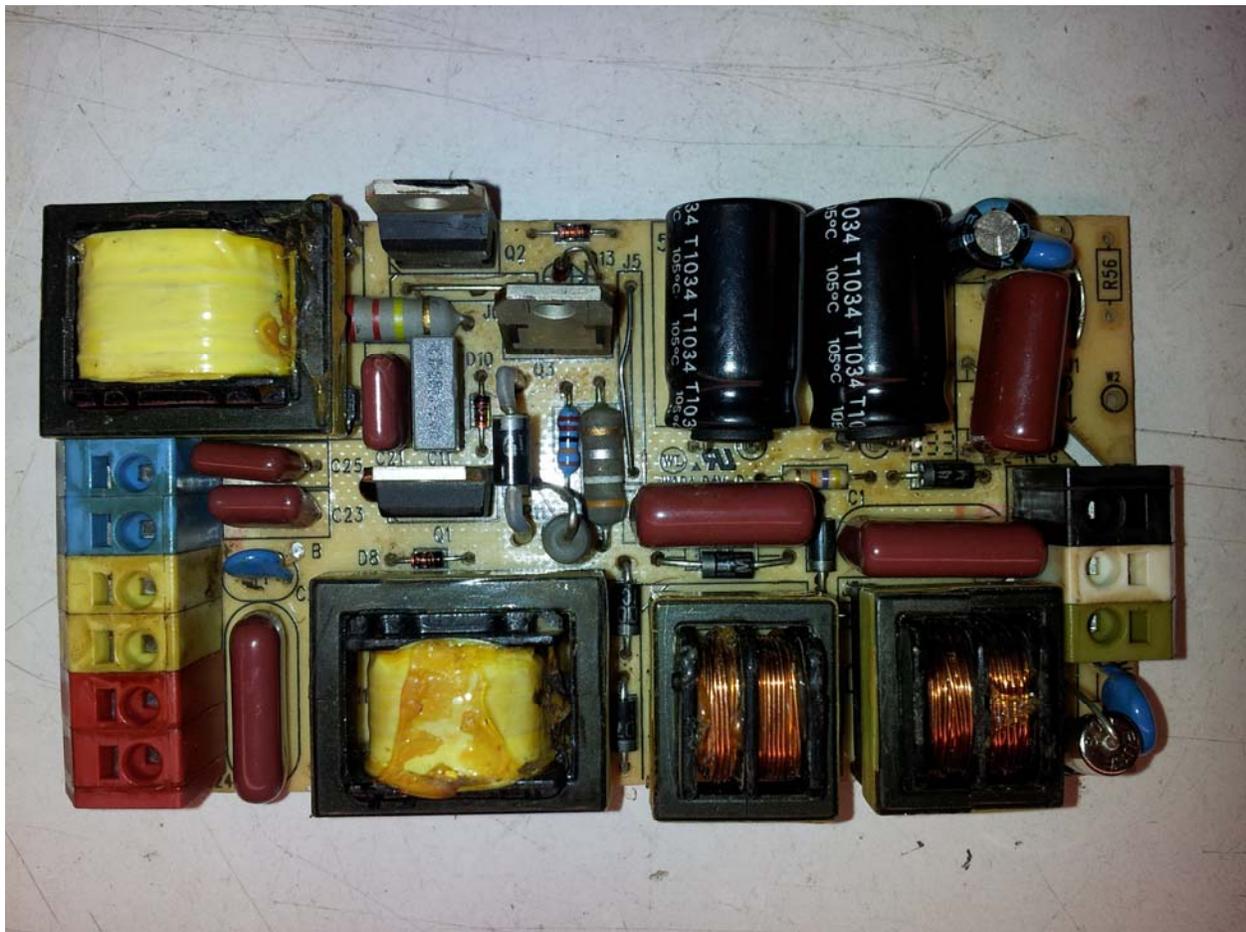
COUNT IX

Infringement of the Shackle Patent – HOWARD

80. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

81. Howard has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Shackle patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Shackle patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): EP2/13CF, EP2/18CF, EP2/26CF, EP2/42CF, EP2/28T5/PRS/MV, EP2/39HO/PRS/MV, EP2/54HO/PRS/MV. Howard is thus liable for direct infringement of the Shackle patent pursuant to 35 U.S.C. § 271(a).

82. The following screenshot is a top view of the circuit board for an infringing Howard electronic ballast that operates a 26 watt CFL:



EP2/26CF

83. On information and belief, Howard has infringed and is infringing the Shackle patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Shackle patent number. On information and belief, Howard likewise has knowledge that its accused products infringe the Shackle patent. Howard's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

84. Robertson has suffered and continues to suffer damages as a result of Howard's infringement of the Shackle patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Howard for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Howard's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

85. Howard's infringement of the Shackle patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Howard Industries is enjoined by this Court.

COUNT X

Infringement of the Allison/Moore Patent – HOWARD

86. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

87. Howard has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Allison/Moore patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Allison/Moore patent, specifically including the following products

containing Century Concepts' circuit board numbers (and all variants of same): EP2/13CF, EP2/18CF, EP2/26CF, EP2/42CF, EP2/28T5/PRS/MV, EP2/39HO/PRS/MV, EP2/54HO/PRS/MV. Howard is thus liable for direct infringement of the Allison/Moore patent pursuant to 35 U.S.C. § 271(a).

88. In addition, on information and belief, Howard has infringed and is infringing the Allison/Moore patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Allison/Moore patent number. On information and belief, Howard likewise has knowledge that its accused products infringe the Allison/Moore patent. Howard's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

89. Robertson has suffered and continues to suffer damages as a result of Howard's infringement of the Allison/Moore patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Howard for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Howard's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

90. Howard's infringement of the Allison/Moore patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Howard Industries is enjoined by this Court.

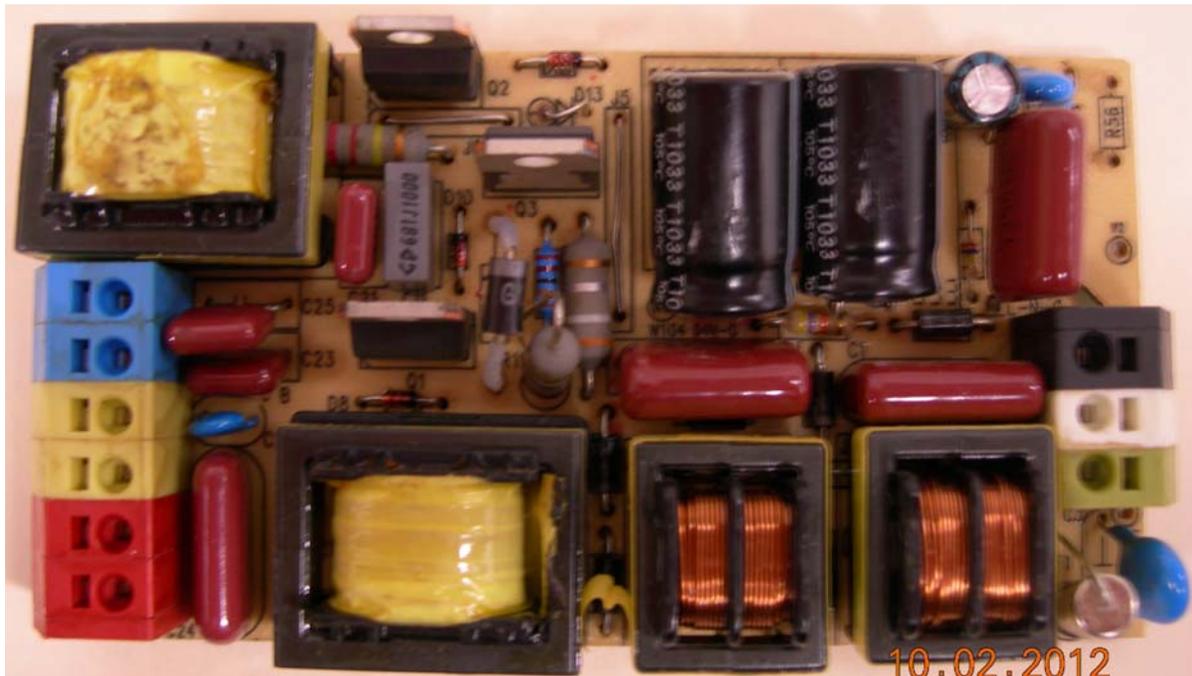
COUNT XI

Infringement of the Shackle Patent – KEYSTONE

91. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

92. Keystone has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Shackle patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Shackle patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): KTEB-213-UV-TP-PSD, KTEB-218-UV-TP-PSD, KTEB-226-UV-TP-PSD, KTEB-242-UV-TP-PSD, KTEB-224HO-UV-TP-PS, KTEB-228HE-UV-TP-PS, KTEB-428-HE-UV-PS, KTEB-239HO-UV-TP-PS, KTEB-454HO-UV-TP-PS. Keystone is thus liable for direct infringement of the Shackle patent pursuant to 35 U.S.C. § 271(a).

93. The following screenshot is a top view of the circuit board for an infringing Keystone electronic ballast that operates a 26 watt CFL:



KTEB-226-UV-TP-PSD

94. On information and belief, Keystone has infringed and is infringing the Shackle patent with knowledge of Robertson's patent rights, at least from the time of the filing of the

present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Shackle patent number. On information and belief, Keystone likewise has knowledge that its accused products infringe the Shackle patent. Keystone's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

95. Robertson has suffered and continues to suffer damages as a result of Keystone's infringement of the Shackle patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Keystone for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Keystone's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

96. Keystone's infringement of the Shackle patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Keystone is enjoined by this Court.

COUNT XII

Infringement of the Allison/Moore Patent – KEYSTONE

97. Robertson refers to and incorporates herein the allegations of paragraphs 1 through 34.

98. Keystone has directly infringed and continues to directly infringe, either literally or under the doctrine of equivalents, one or more claims of the Allison/Moore patent by importing, making, using, selling, and/or offering to sell in the United States electronic ballasts disclosed and claimed in the Allison/Moore patent, specifically including the following products containing Century Concepts' circuit board numbers (and all variants of same): KTEB-213-UV-TP-PSD, KTEB-218-UV-TP-PSD, KTEB-226-UV-TP-PSD, KTEB-242-UV-TP-PSD, KTEB-

224HO-UV-TP-PS, KTEB-228HE-UV-TP-PS, KTEB-428-HE-UV-PS, KTEB-239HO-UV-TP-PS, KTEB-454HO-UV-TP-PS. Keystone is thus liable for direct infringement of the Allison/Moore patent pursuant to 35 U.S.C. § 271(a).

99. In addition, on information and belief, Keystone has infringed and is infringing the Allison/Moore patent with knowledge of Robertson's patent rights, at least from the time of the filing of the present lawsuit, and on information and belief prior to that date because Robertson marks its competing ballasts and specification sheets with the Allison/Moore patent number. On information and belief, Keystone likewise has knowledge that its accused products infringe the Allison/Moore patent. Keystone's acts of infringement have been and continue to be willful, deliberate, and in reckless disregard of Robertson's patent rights.

100. Robertson has suffered and continues to suffer damages as a result of Keystone's infringement of the Allison/Moore patent. Pursuant to 35 U.S.C. § 284, Robertson is entitled to recover damages from Keystone for its infringing acts in an amount subject to proof at trial, but no less than a reasonable royalty. Robertson is further entitled to enhanced damages for Keystone's acts of willful patent infringement pursuant to 35 U.S.C. § 284.

101. Keystone's infringement of the Allison/Moore patent has damaged and will continue to damage Robertson, causing irreparable harm for which there is no adequate remedy at law, unless Keystone is enjoined by this Court.

JURY DEMAND

Robertson hereby requests a trial by jury in Chicago, Illinois, pursuant to Rule 38 of the Federal Rules of Civil Procedure.

PRAYER FOR RELIEF

Plaintiff Robertson Worldwide respectfully requests this Court to enter judgment in their favor and against all Defendants, granting the following relief:

- A. Judgment in Plaintiff's favor on Counts I through XII;
- B. Judgment in Plaintiff's favor that Defendants have infringed and continue to infringe the Shackle patent;
- C. An award to Plaintiff of damages adequate to compensate it for Defendants' acts of infringing the Shackle patent, in an amount no less than a reasonable royalty, together with interest and costs as fixed by the Court pursuant to 35 U.S.C. § 284;
- D. An award to Plaintiff of enhanced damages, up to and including treble damages, pursuant to 35 U.S.C. § 284, for Defendants' acts of willful patent infringement of the Shackle patent;
- E. A grant of permanent injunction, pursuant to 35 U.S.C. § 283, against Defendants, enjoining Defendants from further acts of infringing the Shackle patent;
- F. Judgment in Plaintiff's favor that Defendants have infringed and continue to infringe the Allison/Moore patent;
- G. An award to Plaintiff of damages adequate to compensate it for Defendants' acts of infringing the Allison/Moore patent, in an amount no less than a reasonable royalty, together with interest and costs as fixed by the Court pursuant to 35 U.S.C. § 284;
- H. An award to Plaintiff of enhanced damages, up to and including treble damages, pursuant to 35 U.S.C. § 284, for Defendants' acts of willful patent infringement of the Allison/Moore patent;

- I. A grant of permanent injunction, pursuant to 35 U.S.C. § 283, against Defendants, enjoining Defendants from further acts of infringing the Allison/Moore patent;
- J. An award to Plaintiff of its costs of suit and reasonable attorneys' fees, pursuant to 35 U.S.C. § 285, due to the exceptional nature of this case;
- K. Any further relief that this Court deems just and proper.

Date: October 10, 2012

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