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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

LIPPERT COMPONENTS)	
MANUFACTURING, INC.,)	
)	
Plaintiff,)	
)	
v.)	No.
)	
MOR/RYDE INTERNATIONAL INC, and)	JURY TRIAL DEMANDED
MOR/RYDE INC,)	
)	
Defendants.)	

COMPLAINT

Plaintiff, Lippert Components Manufacturing, Inc. (“Lippert”), for its Complaint against Defendants, MOR/ryde International Inc. and MOR/ryde Inc. (collectively, “Defendants”), alleges and states:

PARTIES, JURISDICTION AND VENUE

1. Lippert is a Delaware corporation having a principal place of business in Elkhart, Indiana.
2. MOR/ryde International Inc. is an Indiana corporation having a principal place of business in Elkhart, Indiana.
3. MOR/ryde Inc. is an Indiana corporation having a principal place of business in Elkhart, Indiana.
4. This is a complaint for patent infringement pursuant to 35 U.S.C. § 271 *et seq.* This court has subject matter jurisdiction over Lippert’s claims pursuant to 28 U.S.C. § 1331 (federal question) and 1338 (patent).

5. Defendants are located in this judicial district, and are doing business within this judicial district, subjecting both to jurisdiction within this judicial district and making venue proper in this judicial district pursuant to 28 U.S.C. §§ 1391 and 1400.

LIPPERT'S PATENTS

6. On April 5, 2011, United States Patent No. 7,918,478 (“the ‘478 Patent”) entitled “Equalizer for Suspension System” was duly and legally issued. A true and correct copy is attached hereto as Exhibit A.

7. Lippert is the assignee of all right, title, and interest in and to the ‘478 Patent.

8. On November 20, 2007, United States Patent No. 7,296,821 (“the ‘821 Patent”) entitled “Equalizer for a Suspension System” was duly and legally issued. A true and correct copy is attached hereto as Exhibit B.

9. Lippert is the assignee of all right, title, and interest in and to the ‘821 Patent.

10. On information and belief, Defendants have made, used, offered for sale, sold, and/or imported equalizers for suspension systems in this judicial district.

Count I

‘478 PATENT INFRINGEMENT

11. Paragraphs 1-10 are incorporated herein by reference as if fully set forth.

12. Defendants, despite their knowledge of Lippert’s rights in the ‘478 Patent, have been, and still are, infringing at least claim 1 of Lippert’s ‘478 Patent by making, selling, using, offering to sell, or importing devices embodying the patented inventions, for example, Defendants’ CRE/3000 and SRE/4000 equalizer products, and will continue to do so unless

enjoined by this Court.

13. Defendants, despite their knowledge of Lippert's rights in the '478 Patent, are inducing the infringement by others of at least claim 15 of the '478 Patent by selling to third parties their equalizer products, for example, their CRE/3000 and SRE/4000 equalizer products, with the intent that the third parties incorporate Defendants' equalizer products into systems that infringe at least claim 15 of the '478 patent, and will continue to do so unless enjoined by this Court.

14. Defendants, despite their knowledge of Lippert's rights in the '478 Patent, have contributed to other's infringement of at least claim 15 of the '478 Patent, by selling to third parties Defendants' equalizer products, for example, Defendants' CRE/3000 and SRE/4000 equalizer products, whom Defendants know will incorporate the equalizer products into equalizer systems that infringe at least claim 15 of the '478 patent. Defendants' equalizer products have no substantial non-infringing use, and are designed specifically for use in equalizer systems.

Count II

'821 PATENT INFRINGEMENT

15. Paragraphs 1-14 are incorporated herein by reference as if fully set forth.

16. Defendants, despite their knowledge of Lippert's rights in the '821 Patent, have been, and still are, infringing at least claim 1 of Lippert's '821 Patent by making, selling, using, offering to sell, or importing devices embodying the patented inventions, for example, Defendants' CRE/3000 and SRE/4000 equalizer products, and will continue to do so unless enjoined by this Court.

17. Defendants, despite their knowledge of Lippert's rights in the '821 Patent, are

inducing the infringement by others of at least claim 14 of the '821 Patent by selling to third parties their equalizer products, for example, their CRE/3000 and SRE/4000 equalizer products, with the intent that the third parties incorporate Defendants' equalizer products into systems that infringe at least claim 14 of the '821 patent, and will continue to do so unless enjoined by this Court.

18. Defendants, despite their knowledge of Lippert's rights in the '821 Patent, have contributed to other's infringement of at least claim 14 of the '821 Patent, by selling to third parties Defendants' equalizer products, for example, Defendants' CRE/3000 and SRE/4000 equalizer products, whom Defendants know will incorporate the equalizer products into systems that infringe at least claim 14 of the '821 patent. Defendants' equalizer products have no substantial non-infringing uses, and are designed specifically for use in equalizer systems.

THE HARM TO LIPPERT

19. Paragraphs 1-18 are incorporated herein by reference as if fully set forth.

20. Defendants, by their infringing conduct, including their contributory infringement and their inducement of infringement by others, have caused Lippert irreparable harm for which there is no adequate remedy at law.

21. Defendants have engaged in their conduct willfully and in complete disregard of, or with indifference to, Lippert's rights and interests.

22. Lippert has suffered damage as a result of Defendants' infringement to date.

23. Defendants' actions render this an 'exceptional case' as that term is defined in 35 U.S.C. §285.

WHEREFORE, Lippert prays that this Court:

A. Preliminarily and permanently enjoin Defendants and their officers, agents, servants, employees and attorneys and those in active concert or participation with them, who receive actual notice of the Order, from importing, marketing, manufacturing, using, selling and/or offering for sale, or contributing to or inducing others to make, use, sell or offer for sale devices which infringe Lippert's '478 Patent and '821 Patent.

B. Award Lippert monetary damages adequate to compensate Lippert for past infringement consistent with 35 U.S.C. § 284, up to and including treble the amount of actual damages assessed, together with costs and prejudgment interest.

C. Award Lippert its reasonable attorneys' fees and costs pursuant to 35 U.S.C. § 285.

D. Order Defendants to provide notice to Defendants' customers of the infringing systems and of Defendants' unlawful acts.

E. Grant and award any and all relief to Lippert deemed just and proper under these circumstances.

JURY DEMAND

Lippert demands a trial by jury on its claims.

Dated: October 30, 2014

s/Alice J. Springer
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