

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

_____)	
ROBERT BOSCH LLC,)	
)	
Plaintiff,)	
)	
vs.)	
)	CIVIL ACTION NO. _____
UL ENTERPRISES LLC d/b/a STNA,)	
DANYANG UPC AUTO PARTS CO., LTD.,)	JURY TRIAL DEMANDED
and SCAN TOP ENTERPRISE CO. LTD.,)	
)	
Defendants.)	
)	
_____)	

COMPLAINT

Plaintiff Robert Bosch LLC (“plaintiff”), through its attorneys, for its complaint against defendants UL Enterprises LLC d/b/a STNA, Danyang UPC Auto Parts Co., Ltd., and Scan Top Enterprise Co. Ltd. (collectively “defendants”), avers as follows:

1. This action arises under the patent laws of the United States, Title 35 of the United States Code (for example, §§ 271, 281, 283, 284 and 285) as hereinafter more fully appears. This Court has jurisdiction over the subject matter of the action pursuant to 28 U.S.C. §§ 1331 and 1338.

COUNT ONE – INFRINGEMENT OF U.S. PATENT NO. 6,530,111

2. On March 11, 2003, United States Letters Patent No. 6,530,111 (“the ’111 patent,” attached as Exhibit A) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

3. Defendants have infringed and are still infringing the '111 patent directly and indirectly by making, importing, offering for sale, using and selling windshield wiper blades embodying the patented invention, such as the Valvoline Aquablade and beam-type wiper blades sold under the DuPont brand, and will continue to do so unless enjoined by this Court.

4. Plaintiff has no adequate remedy at law against defendants' infringement and, unless defendants are enjoined from their infringement of the '111 patent, plaintiff will suffer irreparable harm.

5. Defendants have knowledge of the '111 patent and such infringement is and continues to be willful and deliberate.

6. As a result of defendants' acts of infringement, plaintiff has suffered and will continue to suffer damages in an amount to be proven at trial.

COUNT TWO – INFRINGEMENT OF U.S. PATENT NO. 6,553,607

7. On April 29, 2003, United States Letters Patent No. 6,553,607 ("the '607 patent," attached as Exhibit B) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

8. Defendants have infringed and are still infringing the '607 patent directly and indirectly by making, importing, offering for sale, using and/or selling windshield wiper blades embodying the patented invention, such as the Valvoline Aquablade, the Michelin Stealth and beam-type wiper blades sold under the DuPont brand, and will continue to do so unless enjoined by this Court.

9. Plaintiff has no adequate remedy at law against defendants' infringement and, unless defendants are enjoined from their infringement of the '607 patent, plaintiff will suffer irreparable harm.

10. Defendants have knowledge of the '607 patent and such infringement is and continues to be willful and deliberate.

11. As a result of defendants' acts of infringement, plaintiff has suffered and will continue to suffer damages in an amount to be proven at trial.

COUNT THREE – INFRINGEMENT OF U.S. PATENT NO. 6,611,988

12. On September 2, 2003, United States Letters Patent No. 6,611,988 (“the '988 patent,” attached as Exhibit C) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

13. Defendants have infringed and are still infringing the '988 patent directly and indirectly by making, importing, offering for sale, using and/or selling windshield wiper blades embodying the patented invention, such as the Michelin Stealth and beam-type wiper blades sold under the DuPont brand, and will continue to do so unless enjoined by this Court.

14. Plaintiff has no adequate remedy at law against defendants' infringement and, unless defendants are enjoined from their infringement of the '988 patent, plaintiff will suffer irreparable harm.

15. Defendants have knowledge of the '988 patent and such infringement is and continues to be willful and deliberate.

16. As a result of defendants' acts of infringement, plaintiff has suffered and will continue to suffer damages in an amount to be proven at trial.

COUNT FOUR – INFRINGEMENT OF U.S. PATENT NO. 6,836,926

17. On January 4, 2005, United States Letters Patent No. 6,836,926 (“the '926 patent,” attached as Exhibit D) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

18. Defendants have infringed and are still infringing the '926 patent directly and indirectly by making, importing, offering for sale, using and/or selling windshield wiper blades embodying the patented invention, such as the Valvoline Aquablade, the Michelin Stealth, and beam-type wiper blades sold under the DuPont brand, and will continue to do so unless enjoined by this Court.

19. Plaintiff has no adequate remedy at law against defendants' infringement and, unless defendants are enjoined from their infringement of the '926 patent, plaintiff will suffer irreparable harm.

20. Defendants have knowledge of the '926 patent and such infringement is and continues to be willful and deliberate.

21. As a result of defendants' acts of infringement, plaintiff has suffered and will continue to suffer damages in an amount to be proven at trial.

COUNT FIVE – INFRINGEMENT OF U.S. PATENT NO. 6,944,905

22. On September 20, 2005, United States Letters Patent No. 6,944,905 (“the '905 patent,” attached as Exhibit E) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

23. Defendants have infringed and are still infringing the '905 patent directly and indirectly by making, importing, offering for sale, using and/or selling windshield wiper blades embodying the patented invention, such as the Valvoline Aquablade and Michelin Stealth wiper blades, and will continue to do so unless enjoined by this Court.

24. Plaintiff has no adequate remedy at law against defendants' infringement and, unless defendants are enjoined from their infringement of the '905 patent, plaintiff will suffer irreparable harm.

25. Defendants have knowledge of the '905 patent and such infringement is and continues to be willful and deliberate.

26. As a result of defendants' acts of infringement, plaintiff has suffered and will continue to suffer damages in an amount to be proven at trial.

COUNT SIX – INFRINGEMENT OF U.S. PATENT NO. 6,973,698

27. On December 13, 2005, United States Letters Patent No. 6,973,698 (“the '698 patent,” attached as Exhibit F) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

28. Defendants have infringed and are still infringing the '698 patent directly and indirectly by making, importing, offering for sale, using and/or selling windshield wiper blades embodying the patented invention, such as the Valvoline Aquablade and beam-type wiper blades sold under the DuPont brand, and will continue to do so unless enjoined by this Court.

29. Plaintiff has no adequate remedy at law against defendants' infringement and, unless defendants are enjoined from their infringement of the '698 patent, plaintiff will suffer irreparable harm.

30. Defendants have knowledge of the '698 patent and such infringement is and continues to be willful and deliberate.

31. As a result of defendants' acts of infringement, plaintiff has suffered and will continue to suffer damages in an amount to be proven at trial.

COUNT SEVEN – INFRINGEMENT OF U.S. PATENT NO. 7,293,321

32. On November 13, 2007, United States Letters Patent No. 7,293,321 (“the '321 patent,” attached as Exhibit G) were duly and legally issued for an invention in a windshield wiper blade. Plaintiff is the owner of those Letters Patent.

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