

2. Plaintiff General Technologies, Inc. is a corporation formed under the laws of the State of Texas, with its registered and principal office at 13022 Trinity Drive, Stafford, TX 77477.

3. On information and belief, Defendant VStructural, LLC is a limited liability corporation formed under the laws of the State of Maryland, with principal offices at 7455-T New Ridge Road, Hanover, MD 21076 (also listed as 7455-T New Ridge Road 414, Baltimore, MD 21227). Defendant VStructural, LLC may be served by service on its registered agent, National Registered Agents, Inc. at 350 N. St. Paul Street, Suite 2900, Dallas, TX 75201-4234. On information and belief, Defendant VStructural, LLC maintains an office in this district at 15600 Trinity Boulevard, Suite 118, Fort Worth, TX 76155.

4. On information and belief, Defendant SGI Holdings, LLC (formerly Structural Group, LLC) is the 100% owner of Defendant VStructural, LLC and is a limited liability corporation formed under the laws of the State of Maryland, with principal offices at 7455-T New Ridge Road, Hanover, MD 21076. Defendant SGI Holdings, LLC may be served by service on its registered agent, National Registered Agents, Inc. of MD at 351 W Camden Street, Baltimore, MD 21201. On information and belief, Defendant SGI Holdings, LLC maintains an office in this district at 15600 Trinity Boulevard, Suite 118, Fort Worth, TX 76155.

JURISDICTION AND VENUE

5. This action arises under the patent laws of the United States, Title 35 of the United States Code, including 35 U.S.C. §271. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

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

7. On information and belief, Defendants are subject to this Court's specific and general personal jurisdiction. On information and belief, Defendants have committed acts of infringement in Texas and in this district by making, using, and/or selling the patented invention in this district. On information and belief, Defendants have a presence in this district, conduct business in this district, and make, use, and sell the infringing product in this district, at their office at 350 N. St. Paul Street, Suite 2900, Dallas, TX 75201-4234.

Background

8. GTI and VStructural are competitors in various aspects of business relating to concrete construction, and, in particular, in business relating to highway and bridge construction.

9. The '435 Patent issued June 22, 2004 to Plaintiff Sorkin. Since issuance, Plaintiff Sorkin has owned and still owns all rights, title and interest (including all rights to sue for past, present and future infringement) in the '435 Patent. Plaintiff GTI is the exclusive licensee under the '435 Patent.

10. The '105 Patent issued July 20, 2004 to Plaintiff Sorkin. Since issuance, Plaintiff Sorkin has owned and still owns all rights, title and interest (including all rights to sue for past, present and future infringement) in the '105 Patent. Plaintiff GTI is the exclusive licensee under the '105 Patent.

11. The '821 Patent issued April 5, 2005 to Plaintiff Sorkin. Since issuance, Plaintiff Sorkin has owned and still owns all rights, title and interest (including all rights

to sue for past, present and future infringement) in the '821 Patent. Plaintiff GTI is the exclusive licensee under the '821 Patent.

12. The '347 Patent issued March 30, 2010 to Plaintiff Sorkin. Since issuance, Plaintiff Sorkin has owned and still owns all rights, title and interest (including all rights to sue for past, present and future infringement) in the '347 Patent. Plaintiff GTI is the exclusive licensee under the '347 Patent.

13. The titles of the four Segmental Duct Coupler Patents are as follows:

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| 6,752,435 | Symmetrical coupler apparatus for use with precast concrete segmental construction |
| 6,764,105 | Duct coupler apparatus for use with precast concrete segmental construction |
| 6,874,821 | Coupler apparatus for use with angled post-tension cables in precast concrete segmental construction |
| 7,686,347 | Couplers for use with ducts of concrete segmental construction |

14. The components used in bridge construction are often specified by government agencies and standard setting organizations. For example, the Florida Department of Transportation has specified these couplers as requirements for certain projects. A supplier, such as Defendants, cannot get the contract for projects that specify the patented couplers unless the supplier provides the patented couplers. The supplier can either purchase the patented couplers from GTI or infringe the Segmental Duct Coupler Patents. Defendants have chosen to infringe.

15. On information and belief, Defendants manufacture, use, and sell the "VSL Segmental Duct Coupler" which infringes claims and embodies the patented invention of each of the Segmental Duct Coupler Patents, and Defendants will continue

to do so unless enjoined by this Court. On information and belief, Defendants have supplied and are supplying their “VSL Segmental Duct Couplers” for numerous projects across the United States, including, projects in this district.

16. By an exchange of letters, Plaintiffs complied with the statutory requirement to give Defendants written notice of the infringement of the ’435 and ’105 Patents.

17. On information and belief, Defendants know about the Segmental Duct Coupler Patents and know that Defendants infringe. For example, Defendant Vstructural LLC attempted, unsuccessfully, to invalidate the ’435 Patent. On June 15, 2011, Defendant VStructural LLC requested that the United States Patent and Trademark Office “reexamine” the ’435 patent, specifically alleging that Claims 1, 3, and 16 were anticipated by and were obvious in light of U.S. Patent Nos. 6,389,764 and 1,988,694. After certain amendments to claims, the United States Patent and Trademark Office rejected the arguments of anticipation and obviousness and issued an “Ex Parte Reexamination Certificate” for the ’435 Patent. At the very least, Defendants knew about the ’435 and ’105 Patents and knew that there was and is a high risk that the VSL Segmental Duct Couplers infringe the claims of the ’435 and ’105 Patents. Further, as of the filing and service of this Complaint, Defendants will certainly know of the remaining Segmental Duct Coupler Patents, and if Defendants continue to make, use, or sell the VSL Segmental Duct Couplers, Defendants will know that the continued acts infringe or have a high risk of infringing the Segmental Duct Coupler Patents. Despite an objectively high likelihood that the VSL Segmental Duct Couplers infringe the claims of the Segmental Duct Coupler Patents, Defendants have continued to make, use, and sell

the VSL Segmental Duct Couplers and have shown a deliberate disregard for Plaintiffs' patent rights.

18. On information and belief, if it is determined that Defendants are not themselves infringing the claims of the Segmental Duct Coupler Patents, then Defendants' customers infringe the claims of the Segmental Duct Coupler Patents when the customers sell or use the VSL Segmental Duct Couplers in construction projects.

19. The VSL Segmental Duct Couplers are material components for practicing the inventions claimed by the Segmental Duct Coupler Patents and have no substantial non-infringing uses. On information and belief, Defendants know that the VSL Segmental Duct Couplers are especially made or especially adapted for use in an infringement of the claims of the Segmental Duct Coupler Patents.

20. On information and belief, each Defendant is inducing its customers to purchase and use the VSL Segmental Duct Couplers and each Defendant knows that the use of the VSL Segmental Duct Couplers is an infringement (or results in an apparatus that is an infringement) of the claims of the Segmental Duct Coupler Patents. In particular, the VSL Segmental Duct Couplers, as designed by Defendants and as sold by Defendants, when assembled, result in an infringement of the claims of the Segmental Duct Coupler Patents. For example, Defendants submitted designs of the VSL Segmental Duct Couplers to the Florida Department of Transportation, and those designs show an apparatus that infringes the claims of the Segmental Duct Coupler Patents. Further, on information and belief, Defendants' marketing materials show VSL Segmental Duct Couplers that infringe the claims of the Segmental Duct Coupler Patents.

1ST CAUSE OF ACTION
INFRINGEMENT OF THE '435 PATENT

21. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant infringes at least Claims 1 and 3 of the '435 Patent, and one or more of the claims that depend from those claims. Each Defendant directly or indirectly infringes the '435 Patent either by itself, or, alternatively, in conjunction with its customers who use the VSL Segmental Duct Couplers with the ducts and concrete segments and tendons used in construction.

22. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in contributory infringement of the '435 Patent.

23. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in inducement of infringement of the '435 Patent.

24. The actions of each Defendant constitute willful infringement.

2ND CAUSE OF ACTION
PATENT INFRINGEMENT OF THE '105 PATENT

25. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant infringes at least Claim 1 of the '105 Patent, and one or more of the claims that depend from that claim. Each Defendant directly or indirectly infringes the '105 Patent either by itself, or, alternatively, in conjunction with its customers who use the VSL Segmental Duct Couplers with the ducts and concrete segments and tendons used in construction.

26. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in contributory infringement of the '105 Patent.

27. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in inducement of infringement of the '105 Patent.

28. The actions of each Defendant constitute willful infringement.

3RD CAUSE OF ACTION
PATENT INFRINGEMENT OF THE '821 PATENT

29. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant infringes at least Claim 1 of the '821 Patent, and one or more of the claims that depend from that claim. Each Defendant directly or indirectly infringes the '821 Patent either by itself, or, alternatively, in conjunction with its customers who use the VSL Segmental Duct Couplers with the ducts and concrete segments and tendons used in construction.

30. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in contributory infringement of the '821 Patent.

31. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in inducement of infringement of the '821 Patent.

32. The actions of each Defendant constitute willful infringement.

4TH CAUSE OF ACTION
PATENT INFRINGEMENT OF THE '347 PATENT

33. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant infringes at least Claim 1 of the '347 Patent, and one or more of the claims that depend from that claim. Each Defendant directly or indirectly infringes the '347 Patent either by itself, or, alternatively, in conjunction with its customers who use the VSL Segmental Duct Couplers with the ducts and concrete segments and tendons used in construction.

34. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in contributory infringement of the '347 Patent.

35. Through making, using, and selling the VSL Segmental Duct Couplers, each Defendant engages in inducement of infringement of the '347 Patent.

36. The actions of each Defendant constitute willful infringement.

DAMAGES AND HARM

37. Because of the actions of Defendants described in this Complaint, Plaintiffs are being damaged and irreparably harmed by Defendants' infringement. Plaintiffs are thus entitled to recover damages adequate to compensate Plaintiffs for the infringement, but in no event less than a reasonable royalty.

38. Defendants' infringement will continue to injure Plaintiffs, unless and until enjoined by this Court.

COSTS AND ATTORNEYS' FEES

39. Plaintiffs are entitled to recover their costs and reasonable and necessary attorney's fees incurred herein under 35 U.S.C. §§ 284 and 285, for which they hereby sue.

JURY DEMAND

40. Plaintiffs request a trial by jury, pursuant to Rule 38(b) of the Federal Rules of Civil Procedure on all issues triable of right by jury.

PRAYER FOR RELIEF

Plaintiffs pray for judgment against Defendants for the following:

A. That Defendants are infringing and have infringed the Segmental Duct Coupler Patents and have engaged in contributory infringement and inducement of infringement;

B. Enjoining each Defendant, and its affiliates, subsidiaries, officers, directors, employees, agents, representatives, licensees, successors, assigns and all those acting for it and on its behalf, or acting in concert with it, from further infringement of the Segmental Duct Coupler Patents;

C. Ordering an accounting for damages and awarding to Plaintiffs their actual damages and damages adequate to compensate, including lost profits, costs, expenses and prejudgment interest and post-judgment interest;

D. Awarding Plaintiffs up to three times the damages pursuant to 35 U.S.C. § 284 as enhanced damages;

E. Awarding Plaintiffs their attorneys' fees and costs of court incurred in connection with this action, pursuant to 35 U.S.C. §§ 284 and 285; and

F. Awarding such other and further relief as the Court deems just and proper.

Respectfully submitted,

By: s/ Tom Adolph

Tom Adolph

Federal ID No. 2181

State ID No. 00928900

Adolph Locklar

4615 Southwest Freeway, Suite 630

Houston, Texas 77027

Email: adolph@adolphlocklar.com

832-830-8489

Fax: 832-830-8958

**ATTORNEY IN CHARGE FOR
PLAINTIFFS**

OF COUNSEL:

Michael Locklar

Texas Bar No. 24010194

Adolph Locklar

4615 Southwest Freeway Ste 630

Houston, TX 77027

locklar@adolphlocklar.com

Telephone: (832) 830-8945

Fax: (832) 830-8958

Mark A. Castillo

Texas State Bar No. 24027795

Joshua L. Shepherd

Texas State Bar No. 24058104

jshepherd@curtislaw.net

CURTIS | CASTILLO PC

901 Main Street, Suite 6515

Dallas, Texas 75202

Telephone: 214.752.2222

Facsimile: 214.752.0709