UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION

KLAUSNER TECHNOLOGIES, INC., a New York corporation, Plaintiff, vs. ADTRAN, INC., a Delaware corporation, Defendant.	CASE NO. **JURY TRIAL DEMANDED**

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Klausner Technologies, Inc. ("Klausner Technologies") sues Defendant Adtran, Inc. ("Defendant") and on information and belief, alleges as follows:

Introduction

1. Plaintiff Klausner Technologies owns the inventions described and claimed in United States Patent Nos. 5,572,576 entitled "Telephone Answering Device Linking Displayed Data with Recorded Audio Message" (the "'576 Patent"). Defendant (a) has used and continues to use Plaintiff's patented technology in products that it makes, uses, sells, and offers to sell, without Plaintiff's permission, and (b) has contributed to or induced, and continues to contribute to or induce, others to infringe the '576 Patent. Plaintiff Klausner Technologies seeks damages for patent infringements and an injunction preventing Defendant from making, using, selling, or offering to sell, and from contributing to and inducing others to make, use, sell, or offer to sell, Plaintiff's patented technology without permission.

Jurisdiction and Venue

2. This is an action for patent infringement arising under the patent laws of the United States, 35 U.S.C. §§ 271 and 281, et seq. The Court has original jurisdiction over this patent infringement action under 28 U.S.C. §§ 1338(a).

3. Venue is proper in this Court because the Defendant is responsible for acts of infringement occurring in the Eastern District of Texas as alleged in this Complaint, and has delivered or caused to be delivered its infringing products in the Eastern District of Texas.

Plaintiff Klausner Technologies

4. Plaintiff Klausner Technologies, Inc. is a corporation existing under and by virtue of the laws of the State of New York.

The '576 Patent

5. The United States Patent and Trademark Office issued the '576 Patent on November 5, 1996. A copy of the '576 Patent is attached as Exhibit A. Through assignment, Plaintiff is the owner of all right, title, and interest, including rights for damages for past infringements, in the '576 Patent.

Defendant Adtran, Inc.

6. Upon information and belief, Adtran, Inc. is a Delaware corporation having its principal place of business in Huntsville, Alabama.

First Claim for Patent Infringement ('576 Patent)

7. On or about November 5, 1996, the '576 Patent, disclosing and claiming a "Telephone Answering Service Linking Displayed Data with Recorded Audio Message," was duly and legally issued by the United States Patent and Trademark Office.

8. Plaintiff Klausner Technologies is the owner of the '576 Patent with full rights to pursue recovery of royalties or damages for infringement of such patent, including full rights to recover past and future damages.

9. Defendant has infringed the '576 Patent and, unless enjoined, will continue to infringe the '576 Patent by manufacturing, using, selling, and offering for sale, visual voicemail products that use or embody the patented invention claimed in the '576 Patent without a license or permission from Plaintiff.

10. Defendant is contributing to or inducing others, including its end users, distributors, and resellers, to make, use, sell, or offer to sell visual voicemail products that infringe the '576 Patent without a license or permission from Plaintiff.

11. Plaintiff has been damaged by Defendant's infringement of the '576 Patent and will suffer additional irreparable damage and impairment of the value of its patent rights unless Defendant is enjoined from continuing to infringe the '576 Patent.

12. Plaintiff demands trial by jury of all issues so triable.

WHEREFORE, Plaintiff prays for judgment as follows:

A. A decree preliminarily and permanently enjoining Defendant, its officers, directors, employees, agents, and all persons in active concert with it, from infringing, and contributing to or inducing others to infringe the ‘576 Patent;

B. Compensatory damages awarding Plaintiff damages caused by Defendant’s infringement of the ‘576 Patent;

C. For costs of suit and attorneys fees;

D. For pre-judgment interest; and

E. For such other relief as justice requires.

Dated: March 5, 2012

Respectfully submitted,

By: /s/ S. Calvin Capshaw

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