IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ARCELORMITTAL FRANCE, and ARCELORMITTAL ATLANTIQUE ET LORRAINE,	)	
Plaintiffs,	)	
v.	)	C.A. No. _____
AK STEEL CORPORATION, SEVERSTAL DEARBORN, INC., and WHEELING-NISSHIN, INC.,	)	**DEMAND FOR JURY TRIAL**
Defendants.	)	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs ArcelorMittal France and ArcelorMittal Atlantique et Lorraine, by their undersigned attorneys, bring this complaint for patent infringement against Defendants AK Steel Corporation, Severstal Dearborn, Inc., and Wheeling-Nisshin, Inc. (collectively, "Defendants") and, in support thereof, allege as follows:

PARTIES

1. Plaintiffs ArcelorMittal France and ArcelorMittal Atlantique et Lorraine (collectively, "ArcelorMittal France") are corporations duly organized and existing under the laws of France, and have their principal places of business at 1 à 5, Rue Lugi Cherubini, 93200 Saint-Denis, France.

2. Upon information and belief, AK Steel Corporation ("AK Steel") is a Delaware corporation having its principal place of business at 9227 Centre Point Drive, West Chester, Ohio 45069.

3. Upon information and belief, Defendant Severstal Dearborn, Inc., formerly known as Severstal North America ("Severstal"), is a Delaware corporation having its principal place of business at 14661 Rotunda Drive, Dearborn, Michigan 48120.

4. Upon information and belief, Defendant Wheeling-Nisshin, Inc. ("Wheeling-Nisshin") is a Delaware corporation having its principal place of business at 400 Penn Street, Follansbee, West Virginia 26037.

BACKGROUND

5. ArcelorMittal France owns by assignment all right, title and interest in and to United States Patent No. 6,296,805 (the "'805 patent") entitled "COATED HOT- AND COLD-ROLLED STEEL SHEET COMPRISING A VERY HIGH RESISTANCE AFTER THERMAL TREATMENT." The '805 patent was duly and legally issued by the United States Patent and Trademark Office on October 2, 2001. In accordance with Local Rule 3.2, a true and correct copy of the '805 patent is attached hereto as Exhibit A.

JURISDICTION AND VENUE

6. This action arises under the federal patent laws, 35 U.S.C. §§ 101 *et seq.*

7. This Court has subject matter jurisdiction over this action based on 28 U.S.C. §§ 1331 and 1338(a).

8. This Court has personal jurisdiction over Defendants because, on information and belief, Defendants are incorporated under the laws of Delaware.

9. Venue is proper under 28 U.S.C. §§ 1391(b) and (c) and 1400.

CLAIM FOR RELIEF
(For Infringement of United States Patent No. 6,296,805)

10. ArcelorMittal France incorporates paragraphs 1-9 by reference as if set forth here in full.

11. On information and belief, AK Steel has been and is now making, using, selling, or offering for sale, within the United States, aluminum coated boron steel products which infringe one or more claims of the '805 patent.

12. On information and belief, Wheeling-Nisshin has been and is now making, using, selling, or offering for sale, within the United States, aluminum coated boron steel products which infringe one or more claims of the '805 patent.

13. On information and belief, Severstal has been and is now selling or offering for sale, within the United States, aluminum coated boron steel products which infringe one or more claims of the '805 patent.

14 ArcelorMittal France has previously given notice to AK Steel of its infringement of the '805 patent and otherwise provides such notice to Wheeling-Nisshin and Severstal through the filing of the instant complaint pursuant to 35 U.S.C. § 287(a).

15. On information and belief, Defendants' infringement of the '805 patent has been and/or continues to be willful.

16. ArcelorMittal France has been damaged by such infringement and will continue to be damaged by such infringement unless enjoined by this Court.

PRAYER FOR RELIEF

WHEREFORE**,** ArcelorMittal France respectfully requests:

(1) an injunction against continued infringement (35 U.S.C. § 283);

(2) an award of damages adequate to compensate ArcelorMittal France for Defendants' infringement of the '805 patent, together with interest and costs as fixed by the Court (35 U.S.C. § 284);

(3) increased and treble damages for willful infringement (35 U.S.C. § 284);

(4) a finding that this is an exceptional case (35 U.S.C. § 285);

(5) its attorneys' fees (35 U.S.C. § 285);

(6) its costs (Fed. R. Civ. P. 54(d)); and

(7) any other relief appropriate under the circumstances.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs ArcelorMittal France and ArcelorMittal Atlantique et Lorraine hereby demand a trial by jury of all issues so triable in this action.

RESPECTFULLY SUBMITTED,

/s/ Jeffrey B. Bove

Jeffrey B. Bove (#998) [jbove@cblh.com]
Chad S.C. Stover (#4919) [cstover@cblh.com]
CONNOLLY BOVE LODGE & HUTZ LLP
1007 North Orange Street
P.O. Box 2207
Wilmington, Delaware 19899
(302) 658-9200

Attorneys for Plaintiffs ArcelorMittal France and ArcelorMittal Atlantique et Lorraine

OF COUNSEL:

Barry J. Herman
Jean-Paul Lavalleye
Eric W. Schweibenz
OBLON, SPIVAK, McCLELLAND,
MAIER & NEUSTADT, L.L.P.
1940 Duke Street
Alexandria, VA 22314
(703) 413-3000

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