IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

WACOH COMPANY, Plaintiff, v. ANALOG DEVICES, INC., ROBERT BOSCH LLC; KIONIX, INC.; VTI TECHNOLOGIES, INC.; and INVENSENSE INC.; Defendants.	§ § § § § § § § § § § § § § § §	C.A. No._____ JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, Wacoh Company ("Wacoh") files this Complaint against Defendants, Analog Devices, Inc. ("ADI"), Robert Bosch LLC ("Bosch"), Kionix, Inc. ("Kionix"), VTI Technologies, Inc. ("VTI Technologies"), and Invensense Inc. ("Invensense"), (collectively "Defendants") and alleges as follows:

THE PARTIES

1. Plaintiff Wacoh Company is a corporation organized and existing under the laws of Japan. Wacoh's principal place of business is Saitama, Japan.

2. ADI, on information and belief, is a corporation organized and existing under the laws of the Commonwealth of Massachusetts, having its principal place of business at One Technology Way, Norwood, Massachusetts 02062. ADI may be served with process by serving its Massachusetts registered agent, CT Corporation System, 155 Federal Street, Suite 700, Boston, MA 02110.

3. Bosch, on information and belief, is a limited liability company organized under the laws of the state of Delaware, having its principal place of business at 2800 S. 25th Avenue, Broadview, Illinois 60155. Bosch may be served with process by serving its Delaware registered agent, Corporation Service Company, 2711 Centerville Road, Suite 400, Wilmington, Delaware 19808.

4. Kionix, on information and belief, is a business incorporated in the state of Delaware, having its principal place of business at 111 8th Ave, New York, NY 10011-5201. Kionix may be served with process by serving its Delaware registered agent, The Corporation Trust Company, The Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware, 19801.

5. VTI Technologies, on information and belief, is a corporation incorporated in the state of Delaware, having its principal place of business at 400 Renaissance Center, Detroit, MI 48243-1668. VTI Technologies may be served with process by serving its Delaware registered agent, National Registered Agents Inc., 160 Greentree Drive, Suite 101, Dover, Delaware, 19904.

6. Invensense, on information and belief, is a corporation organized under the laws of the state of Delaware, having its principal place of business at 1197 Borregas Ave., Sunnyvale, CA 94089. Invensense may be served with process by serving its Delaware registered agent The Corporation Trust Company, The Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

JURISDICTION & VENUE

7. This is an action for infringement of a United States patent. Accordingly, this action arises under the patent laws of the United States of America, 35 U.S.C. § 1 et. seq. and

jurisdiction is properly based on Title 35 United States Code, particularly § 271, and title 28 United States Code, particularly § 1338(a).

8. Venue is proper in this court under Title 28 United States Code § 1391(b) and 1400(b).

PATENT INFRINGEMENT COUNT

9. On September 4, 2001, United States Patent No. 6,282,956 ("the '956 patent") entitled "Multi-Axial Angular Velocity Sensor" was duly and legally issued. A true and correct copy of the '956 patent is attached as Exhibit A.

10. On March 15, 2005, United States Patent No. 6,865,943 ("the '943 patent") entitled "Angular Velocity Sensor" was duly and legally issued. A true and correct copy of the '943 patent is attached as Exhibit B.

11. On April 25, 2000, United States Patent No. 6,053,057 ("the '057 patent") entitled "Force Detector" was duly and legally issued. A true and correct copy of the '057 patent is attached as Exhibit C.

12. On November 13, 2001, United States Patent No. 6,314,823 ("the '823 patent") entitled "Force Detector and Method of Manufacturing the Same" was duly and legally issued. A true and correct copy of the '823 patent is attached as Exhibit D.

13. Pursuant to 35 U.S.C. § 282, the above-listed United States Patents are presumed valid.

14. Kazuhiro Okada is the inventor of the '956, '943, '057 and '823 patents.

15. On July 6, 2010, Kazuhiro Okada assigned his entire interest in the '956, '943, '057 and '823 patents to Wacoh, which is now the sole owner of all four patents.

16. ADI has infringed and continues to infringe one or more of the claims of the '057 patent directly, contributorily, and/or through inducement by making, offering to sell, selling, and/or using sensors, including but not limited to Analog Devices ADXL345XC and any

other sensors that are capable of or use the same or similar method for detecting force or angular velocity. ADI has infringed and continues to infringe one or more of the claims of the '956 and '943 patents directly, contributorily, and/or through inducement by making, offering to sell, selling, and/or using infringing sensors including but not limited to Analog Devices ADIS16250 and any other sensors that are capable of or use the same or similar method for detecting force or angular velocity.

17. Bosch has infringed and continues to infringe one or more of the claims of the '956 and '943 patents directly, contributorily, and/or through inducement by making, offering to sell, selling, and using infringing sensors, including but not limited to Bosch SMG070, and any other sensors that are capable of or use the same or similar detection of angular velocity.

18. Kionix has infringed and continues to infringe one or more of the claims of the '823 patent directly, contributorily, and/or through inducement by making, offering to sell, selling, and using infringing sensors, including but not limited to Kionix KXSD9, and any other sensors that are capable of or use the same or similar detection of force.

19. VTI Technologies has infringed and continues to infringe one or more of the claims of the '956 and '943 patents directly, contributorily, and/or through inducement by making, offering to sell, selling, and using infringing sensors, including but not limited to VTI SCC1300-D02, and any other sensors that are capable of or use the same or similar detection of angular velocity.

20. Invensense has infringed and continues to infringe one or more of the claims of the '956 and '943 patents directly, contributorily, and/or through inducement by making, offering to sell, selling, and using infringing sensors, including but not limited to Invensense ITG-

3200, and any other sensors that are capable of or use the same or similar detection of angular velocity.

21. Defendants' infringement alleged above has injured Wacoh. As a result of Defendants' infringement, Wacoh is entitled to recover damages adequate to compensate for the Defendants' infringement, which in no event can be less than a reasonable royalty.

DEMAND FOR JURY TRIAL

22. Wacoh hereby demands a jury trial on all claims and issues triable of right by a jury.

PRAYER FOR RELIEF

Wherefore, Wacoh prays for entry of judgment:

A. that Defendant ADI has infringed at least one or more claims of the '057, '956, and '943 patents;

B. that Defendant Bosch has infringed at least one or more claims of the '956 and '943 patents;

C. that Defendant Kionix has infringed at least one or more claims of the '823 patent;

D. that Defendant VTI Technologies has infringed at least one or more claims of the '956 and '943 patents;

E. that Defendant Invensense has infringed at least one or more claims of the '956 and '943 patents;

F. that Defendants account for and pay to Wacoh all damages caused by their infringement, which by statute can be no less than a reasonable royalty;

G. that Wacoh be granted pre-judgment and post-judgment interest on the damages caused to him by reason of Defendants' infringement;

H. that Wacoh be granted its attorneys' fees in this action;

I. that costs be awarded to Wacoh;

J. that Wacoh be granted such other and further relief as the Court may deem just and proper under the current circumstances.

Dated: July 20, 2010

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