IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SARIF BIOMEDICAL LLC, Plaintiff, v. SIEMENS MEDICAL SOLUTIONS USA, INC. a/k/a SIEMENS HEALTHCARE USA, INC.; SIEMENS AKTIENGESELLSCHAFT, Defendants.	C.A. No. **DEMAND FOR JURY TRIAL**

COMPLAINT

Plaintiff Sarif Biomedical LLC ("Sarif") alleges as follows:

PARTIES

1. Sarif is a limited liability company organized under the laws of the Delaware, having its principal offices at 2820 Lynn Dell Drive, Tool, Texas 75143.

2. Defendant Siemens Medical Solutions USA, Inc. a/k/a Siemens Healthcare USA, Inc. ("Siemens Medical") is a Delaware corporation with a principal place of business at 51 Valley Stream Pkwy, Malvern, PA 19355. Siemens Medical may be served via its registered agent, The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

3. Defendant Siemens Aktiengesellschaft ("Siemens AG") is a German corporation with its principal place of business at Wittelsbacherplatz 2, 80333 Munich, Germany, and which markets and promotes its products in the United States, including in this District.

JURISDICTION AND VENUE

4. This is an action for patent infringement arising under the patent laws of the United States of America, 35 U.S.C. § 1, *et seq*., including § 271. This Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338(a).

5. Venue is proper in this District under 28 U.S.C. §§ 1391 (b)-(d) and 1400(b) because Siemens Health and Siemens AG are subject to personal jurisdiction in this District, have committed acts of patent infringement in this District, or have regular and established places of business in this District.

COUNT I
(Infringement of U.S. Patent No. 5,755,725)

6. Sarif is the owner by assignment of United States Patent No. 5,755,725 ("the '725 patent"), entitled "Computer-Assisted Microsurgery Methods and Equipment." The '725 patent issued on May 26, 1998. A true and correct copy of the '725 patent is attached hereto as Exhibit A.

7. On information and belief, Siemens Health and Siemens AG have been and are directly infringing (literally and under the doctrine of equivalents) at least claim 1 of the '725 patent in this District and throughout the United States by, among other things, making, using, selling, offering to sell, or importing installations for computer-assisted microsurgery, including, but not limited to its Artiste Solution System. To the extent that facts learned in discovery show that Siemens Health and/or Siemens AG's infringement of the '725 patent is or has been willful, Sarif reserves the right to request such a finding at the time of trial.

8. As a result of Siemens Health and Siemens AG's infringement of the '725 patent, Sarif has suffered monetary damages in an amount not yet determined, and will continue to suffer damages in the future unless Siemens Health and Siemens AG's infringing activities are enjoined by this Court.

9. Unless a permanent injunction is issued enjoining Siemens Health and Siemens AG and their agents, servants, employees, attorneys, representatives, affiliates, and all others acting on its behalf from infringing the '725 patent, Sarif will suffer irreparable harm.

PRAYER FOR RELIEF

Sarif prays for the following relief:

1. A judgment that Siemens Health and Siemens AG have infringed (either literally or under the doctrine of equivalents), directly or indirectly, one or more claims of the '725 patent;

2. A permanent injunction enjoining Siemens Health and Siemens AG and their officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert or participation with them, from infringing the '725 patent;

3. An award of damages resulting from Siemens Health and Siemens AG's acts of infringement in accordance with 35 U.S.C. § 284;

4. A judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Sarif its reasonable attorneys' fees against Siemens Health and Siemens AG;

5. A judgment and order requiring Siemens Health and Siemens AG to provide an accounting and to pay supplemental damages to Sarif, including without limitation, pre-judgment and post-judgment interest; and

6. Any and all other relief to which Sarif may show itself to be entitled.

DEMAND FOR JURY TRIAL

Sarif demands a trial by jury on all issues so triable.

May 14, 2013

BAYARD, P.A.

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