

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION**

DAYS CORPORATION,

Plaintiff,

v.

LIPPERT COMPONENTS, INC. and  
INNOVATIVE DESIGN SOLUTIONS, INC.

Defendants.

Civil Action No. 3:17-CV-208-PPS-MGG  
(*consolidated with 3:17-cv-327-RLM-MGG*)<sup>1</sup>

JURY TRIAL DEMANDED

**SECOND AMENDED COMPLAINT FOR DECLARATORY JUDGMENT, PATENT  
INFRINGEMENT, AND UNFAIR COMPETITION**

Plaintiff, Days CORPORATION (“Days”), by its attorneys, for its Second Amended Complaint against Defendants, LIPPERT COMPONENTS, INC. (“Lippert”) and INNOVATIVE DESIGN SOLUTIONS, INC. (“IDS”), alleges as follows:

**THE NATURE OF THE ACTION**

1. Days brings this action against Lippert and IDS pursuant to 28 U.S.C. §§ 2201 and 2202 for a declaratory judgment of non-infringement and invalidity of United States Patent Numbers 6,584,385 and 6,885,924 (respectively, “the ‘385 Patent” and “the ‘924 Patent,” or collectively, “the Lippert Patents”) under the Patent Laws of the United States, Title 35, United States Code.

2. Days also brings this action against Lippert pursuant to 35 U.S.C. § 271 for patent infringement by Lippert of Days’ United States Patent Number 6,619,693 (“the ‘693 Patent” or “the Days Patent”).

---

<sup>1</sup> Pursuant to Orders in both matters entered June 9, 2017.

3. Days also brings this action against Lippert pursuant to the Lanham Act, 15 U.S.C. § 1125 for unfair competition.

### **JURISDICTION AND VENUE**

4. This Court has subject matter jurisdiction under 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1338(a) (any Act of Congress relating to patents). Days is seeking relief pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202. Days is also seeking damages for patent infringement by Lippert under the Patent Laws of the United States of America, 35 U.S.C. § 1, *et seq.* Days is also seeking damages from Lippert for unfair competition under the Lanham Act, 15 U.S.C. § 1125.

5. This Court has personal jurisdiction over Lippert because, on information and belief, Lippert has a principal place of business and conducts substantial business in this District, and Lippert regularly solicits business from, does business with, and derives value from goods and services provided to customers in this District. Moreover, on information and belief, Lippert has committed and continues to commit acts of patent infringement in violation of 35 U.S.C. § 271, and it places infringing products into the stream of commerce, with the knowledge and understanding that such products are sold in the State of Indiana, including in this District. These acts by Lippert cause injury to Days within this District. On information and belief, Lippert derives substantial revenue from the sale of infringing products within this District, Lippert expects their actions to have consequences within this District, and Lippert derives substantial revenue from interstate and international commerce.

6. This Court has personal jurisdiction over IDS because, on information and belief, it transacts business in this District, regularly solicits business from, does business with, and

derives value from goods and services provided to customers in this District, and has entered into contracts with a resident of this District.

7. Venue is proper within this District under 28 U.S.C. § 1391(b) and (c) because Lippert transacts business within this District and offers for sale in this District products that infringe the '693 Patent. In addition, venue is proper because Lippert's principal place of business is in this District and Days has suffered harm in this District. In addition, IDS transacts business within this District and has entered into at least one contract with a resident of this District. Moreover, a substantial part of the events giving rise to the claims occurred in this District.

### **THE PARTIES**

8. Days is a corporation organized and existing under the laws of the State of Indiana, having its principal place of business at 55169 County Road 3 North, Elkhart, Indiana 46514. Days was founded in 1913 as a drayage service and it has been operating in Elkhart, Indiana for more than 100 years. Since its inception, Days has developed a longstanding tradition of quality service and innovation in diverse business sectors, including warehousing, machinery moving, distribution, logistics, export packing, electrical systems for industrial and commercial operations, and leveling systems. The manufacture and sales of vehicle leveling systems is a primary aspect of Days' business.

9. On information and belief, Lippert is a Delaware corporation having its principal place of business at 3501 County Road 6 East, Elkhart, Indiana 46514.

10. On information and belief, Lippert sells products in a broad range of categories that include towing, leveling, awnings, chassis, axles, slide-outs, storage, waste management, electronics, windows, doors, mattresses, furniture plastics, and e-coating.

11. On information and belief, Lippert operates 48 facilities throughout the United States, Canada, and Italy, and it employs more than 7,500 people.

12. On information and belief, Lippert sells vehicle leveling systems that compete with Days' vehicle leveling system products in the same markets.

13. Days and Lippert operate in the recreational vehicle ("RV") industry.

14. Days and Lippert are purveyors of competing systems designed to level a vehicle that is, by way of non-limiting example, situated on uneven terrain causing the vehicle to be oriented on an undesirable plane. The Days Patent describes and claims such a system, and the Lippert Patents purportedly describe competing systems.

15. On information and belief, IDS is a division of Lippert, as is advertised on Lippert's website, <http://www.lci1.com/ids>.

16. Alternatively, on information and belief, IDS is a separate legal entity. The corporate form should be disregarded, however, because the corporate form was so ignored, controlled, or manipulated by Lippert that IDS was merely the instrumentality of Lippert for purposes of patent ownership and enforcement. Not piercing the corporate veil in this case would constitute fraud or promote injustice.

17. There is no practical difference between Lippert and IDS for purposes of patent ownership and enforcement. There existed an agency relationship between the Lippert and IDS where Lippert effectively controls the conduct of IDS, based on at least the following:

- a. Lippert advertises on its publicly available website that IDS is a "division" of Lippert.
- b. Lippert represents in its publicly available RV OEM catalogue that some of its products are patented and that a complete list of its patents can be

found online at <http://www.lippertcomponents.com/company/patent-list>.

The publicly available Master List of Patents represents that Lippert owns the Lippert Patents.

c. Employees of Lippert, including Lippert's Vice President of Sales, RV and Lippert's General Counsel, have accused Days of infringement of the Lippert Patents.

d. Lippert's outside counsel has accused Days of infringement of the Lippert Patents, identifying the patents as:

i. "Lippert Components U.S. Patent Nos. 6,584,385 and 6,885,924"

ii. "Lippert's '385 and '924 patents"

iii. "Lippert's '385 or '924 patents"

e. Lippert's outside counsel demanded that Days enter into an agreement to license the Lippert Patents from Lippert.

f. Lippert's outside counsel demanded that Days mark its products with the numbers of the Lippert Patents.

g. IDS' website is a subdomain of Lippert's website. A contact request to IDS on [www.lci1.com/ids](http://www.lci1.com/ids) is answered by Lippert's Customer Service.

18. Lippert misuses the corporate veil to avoid the Declaratory Judgment Act.

19. Days relied on Lippert's assertions of patent ownership in filing this lawsuit.

20. Days is filing this lawsuit for the purposes of: (i) clarifying Days' rights by obtaining a declaratory judgment from this Court of non-infringement of the Lippert Patents by Days and of invalidity of the Lippert Patents; (ii) seeking damages and an injunction against

Lippert for patent infringement judgment; and (iii) seeking damages and an injunction against Lippert for unfair competition.

### **THE PATENTS-IN-SUIT**

21. The '385 Patent, entitled "Vehicle Leveling Assembly," was issued to Robert M. Ford, *et al.* on June 24, 2003. A copy of the '385 Patent is attached hereto as **Exhibit A**.

22. The '924 Patent, entitled "Vehicle Attitude Adjustment Assembly," was issued to Robert M. Ford, *et al.* on April 26, 2005. A copy of the '924 Patent is attached hereto as **Exhibit B**.

23. The '385 Patent and the '924 Patent are hereinafter referred to as "the Lippert Patents."

24. Lippert claims, through its employees, through its counsel, and through its publicly available website, that Lippert is the owner of the Lippert Patents.

25. Lippert also claims that IDS is the owner of the Lippert Patents.

26. At least one of Lippert and IDS is the owner of the Lippert Patents or has the right to enforce the Lippert Patents.

27. On September 16, 2003, the United States Patent and Trademark Office duly and legally issued the '693 Patent. Days is the assignee of all right, title, and interest in the '693 Patent. A copy of the '693 Patent is attached hereto as **Exhibit C**.

28. Claim 13 of the '693 Patent recites:

An apparatus for automatically leveling a vehicle, comprising:

a plurality of legs each of which is mounted to the vehicle;

wherein each of the legs is movable between a retracted stowed position

and an extended use position; and

wherein each of the legs is moved to the retracted stowed position to allow the vehicle to travel and each of the legs is moved to the extended use position to engage a ground surface prior to leveling the vehicle;

a sensor mounted to the vehicle to sense pitch and roll of the vehicle relative to a reference level plane;

wherein the sensor produces an orientation signal representing the vehicle pitch and roll; and

a controller coupled to each of the legs and the sensor;

wherein the controller monitors the orientation signal received from the sensor and in response to that signal the controller actuates at least one of the legs to move the vehicle relative to the ground surface until the orientation of the vehicle reaches the reference level plane within a tolerance; and

wherein the controller includes a memory for storing data corresponding to the reference level plane and is configured to write data representing an orientation signal to the memory to replace the reference level plane data with orientation signal data.

### **Lippert's/IDS' Unfounded Assertions of Patent Infringement by Days**

29. On September 19, 2016, Andrew Murray, Lippert's Vice-President of Sales, RV, sent a notice email (the "Lippert Notice Email") to Days alleging infringement of the '385 Patent and the '924 Patent by Days in view of Days' Auto-Level hydraulic leveling system (the "Auto-Level System"). (A copy of the Lippert Notice Email is attached hereto as **Exhibit D.**) The Lippert Notice Email came from an Internet domain registered to Lippert.

30. The Auto-Level System is manufactured by the Equalizer Systems division of Days.

31. On October 7, 2016, Shawn Lewis, General Counsel to Lippert, sent another notice email to Days (“the Second Lippert Notice Email”) alleging infringement of the ‘385 Patent and the ‘924 Patent by Days. Mr. Lewis provided “a summary of key points our patent lawyer and engineers provided on infringement of U.S. Patent 6,584,385” and stated that “[T]he Equalizer system is essentially composed of the same components present in our leveling system.” (A copy of the Second Lippert Notice Email is attached hereto as **Exhibit I**.)

32. Mr. Lewis, in referring to “our leveling system” in the Second Lippert Notice Email, meant Lippert’s leveling system.

33. On October 17, 2016, Days acknowledged receipt of the Lippert Notice Email and requested contact information for Lippert’s patent counsel.

34. On October 24, 2016, Mr. Lewis replied with contact information “for our patent counsel handling this matter” and identified Eric Jones. (A copy of the Second Lippert Notice Email is attached hereto as **Exhibit J**.)

35. On December 5, 2016, Eric Jones provided to Days claim charts (the “Lippert Claim Charts”) further detailing Lippert’s position. A copy of the Lippert Claim Charts is attached hereto as **Exhibit E**.

36. In the Lippert Claim Charts, Lippert asserted infringement of claims 1, 14, 15, 26, 29, 34, and 35 of the ‘385 Patent and claims 1, 5, 18-20 of the ‘924 Patent.

37. On January 20, 2017, after a series of email exchanges between Lippert and Days, Days analyzed the Lippert Claim Charts and responded, with assertions of non-infringement and



invalidity with respect to both of the ‘385 Patent and the ‘924 Patent (“the Days Response”). A copy of the Days Response is attached hereto as **Exhibit F**.

38. On February 17, 2017, Eric Jones responded (“the Lippert Reply”) to reiterate Lippert’s position on alleged infringement by Days. A copy of the Lippert Reply is attached hereto as **Exhibit G**.

39. Mr. Jones, in the Lippert Reply, referred to the Lippert Patents as:

- a. “Lippert Components U.S. Patent Nos. 6,584,385 and 6,885,924”
- b. “Lippert’s ‘385 and ‘924 patents”
- c. “Lippert’s ‘385 or ‘924 patents”

40. Lippert, by its counsel, demanded in the Lippert Reply:

- a. “Days Corp’s agreement to enter into an agreement to license from LCI the right to continue making, using, and selling the Auto-Level system.”
- b. That Days “mark all products with licensed LCI patent numbers.”

41. Lippert’s counsel intended, in Ex. G, to identify Lippert by the initials “LCI.”

42. A document entitled the “Lippert Components on-line RV OEM Catalogue, Volume IV” states, in pertinent part: “a complete list of our patents can be found online at [www.lippertcomponents.com/company/patent-list](http://www.lippertcomponents.com/company/patent-list).” (A copy of pages i and vii of this voluminous document are attached as **Exhibit K**.)

43. The hyperlink identified in the previous paragraph is titled “Master Patent List”, and identifies both of the Lippert Patents. (See **Exhibit L** at pages 8 and 16.)

### **Lippert’s Infringement of the ‘693 Patent**

44. Days has protected its innovative products, including its vehicle leveling systems, through a range of intellectual property rights, including the ‘693 Patent.

45. Days has been manufacturing, using, selling, and offering for sale its Auto-Level System since at least as early as 2000.

46. Days' Auto-Level System is covered by one or more claims of the '693 Patent, and Days has marked its Auto-Level System with the '693 Patent number in accordance with 35 U.S.C. § 287 since at least as early as December 31, 2003.

47. On information and belief, Lippert manufactures, uses, sells, and offers for sale vehicle leveling systems that infringe one or more claims of the '693 Patent, including, but not limited to, Lippert's auto level systems for motor homes.

48. In support of Days' assertions of infringement, it provides a Declaration of Jason Loose ("Loose Declaration") at **Exhibit H**. Mr. Loose is the Division Manager of Days' Equalizer Systems Division.

49. As set forth in the Loose Declaration, Mr. Loose has personal knowledge of the automatic level controllers used by Lippert in its auto level systems for motor homes, including how they operate in connection with the Lippert auto level systems. At least one or more claims of the '693 Patent reads on Lippert's auto level systems.

50. In view of reasonable due diligence, including the Loose Declaration, Days alleges plausible grounds for patent infringement by Lippert and a reasonable expectation that discovery will reveal additional evidence to prove the infringement.

**COUNT I**  
**Declaratory Judgment of Non-Infringement by**  
**Days of the '385 Patent**

51. Paragraphs 1-50 are incorporated herein as set forth above.

52. Lippert's communication of the Lippert Notice Email, the Second Lippert Notice Email, the Lippert Claim Charts, and the Lippert Reply to Days has created a reasonable

apprehension on the part of Days that it will be subjected to a lawsuit by Lippert based upon patent infringement if it continues to manufacture, use, sell, and/or offer for sale its Auto-Level System.

53. Lippert's denial of ownership of the Lippert Patents has created a reasonable apprehension on the part of Days that it will be subjected to a lawsuit by IDS based upon patent infringement if it continues to manufacture, use, sell, and/or offer for sale its Auto-Level System.

54. As a result of Lippert's allegations, an actual and justiciable case or controversy exists between Days on the one hand and Lippert and IDS on the other hand regarding the alleged infringement of the '385 Patent by Days.

55. The manufacture, use, sale, and/or offer for sale of Days' Auto-Level System has not infringed, does not infringe, and will not infringe, whether directly or indirectly, any valid claim of the '385 Patent, either literally or under the doctrine of equivalents, at least because:

- a. The Auto-Level System dual axis accelerometer (sensor) is not designed for or capable of being located anywhere in a vehicle, as required by claim 1;
- b. The Auto-Level System controller is not configured to select between different grounding procedures, as required by claim 14; and
- c. The Auto-Level System controller is not programmed to include a zero mode, nor does the System provide an attitude indicator, as required by claim 26.

56. Therefore, Days is entitled to a judgment declaring that it does not infringe any valid claim of the '385 Patent.

**COUNT II**  
**Declaratory Judgment of Non-Infringement by**  
**Days of the '924 Patent**

57. Paragraphs 1-50 are incorporated herein as set forth above.

58. Lippert's communication of the Lippert Notice Email, the Second Lippert Notice Email, the Lippert Claim Charts, and the Lippert Response to Days has created a reasonable apprehension on the part of Days that it will be subjected to a lawsuit by Lippert based upon patent infringement if it continues to manufacture, use, sell, and/or offer for sale its Auto-Level System.

59. Lippert's denial of ownership of the Lippert Patents has created a reasonable apprehension on the part of Days that it will be subjected to a lawsuit by IDS based upon patent infringement if it continues to manufacture, use, sell, and/or offer for sale its Auto-Level System.

60. As a result of Lippert's allegations, an actual and justiciable case or controversy exists between Days on the one hand and Lippert and IDS on the other hand regarding the alleged infringement of the '924 Patent by Days.

61. The manufacture, use, sale, and/or offer for sale of Days' Auto-Level System has not infringed, does not infringe, and will not infringe, whether directly or indirectly, any valid claim of the '924 Patent, either literally or under the doctrine of equivalents, at least because:

- a. The Auto-Level System controller is not configured to command movement of a structure into an attitude where tilt sensor signals match any one of a number of different pre-set reference values corresponding to different desired attitudes of the structure, as required by claim 1;
- b. The Auto-Level System controller is not configured to command movement of a structure into an attitude where tilt sensor signals match

any one of a number of different pre-set reference values corresponding to different desired attitudes of the structure, as required by claim 5;

- c. The Auto-Level System controller does not have a reference value selector connected to a controller, the controller being configured to select between pre-set reference values in response to inputs received from the reference value selector, as required by claim 5; and
- d. The Auto-Level System controller cannot store a first set of signal values and a second set of signal values for reference by the controller when such values are selected in future attitude correction operations, as required by claims 18, 19, and 20.

62. Therefore, Days is entitled to a judgment declaring that it does not infringe any valid claim of the '924 Patent.

**COUNT III**  
**Declaratory Judgment of Invalidity of the**  
**'385 Patent**

63. Paragraphs 1-50 are incorporated herein as set forth above.

64. One or more claims of the '385 Patent are invalid for failure to comply with one or more of the conditions for patentability set forth in Title 35 of the United States Code, including, but not limited to, 35 U.S.C. §§ 102 and/or 103, because of at least United States Patent No. 5,580,095 to Fukumoto, United States Patent No. 5,934,409 to Citron, United States Patent No. 4,433,849 to Ohmori, "*Dual Axis, Low g, Fully Integrated Accelerometers*" by Harvey Weinberg (Analog Dialog 33-1, January 1999), and confidential information owned by Days that qualifies as prior art under 35 U.S.C. § 102(g).

65. Therefore, Days is entitled to a judgment declaring that one or more claims of the ‘385 Patent is invalid.

**COUNT IV**  
**Declaratory Judgment of Invalidity of the**  
**‘924 Patent**

66. Paragraphs 1-50 are incorporated herein as set forth above.

67. One or more claims of the ‘924 are invalid for failure to comply with one or more of the conditions for patentability set forth in Title 35 of the United States Code, including, but not limited to, 35 U.S.C. §§ 102 and/or 103, because of at least United States Patent No. 5,580,095 to Fukumoto, United States Patent No. 5,934,409 to Citron, United States Patent No. 4,433,849 to Ohmori, “*Dual Axis, Low g, Fully Integrated Accelerometers*” by Harvey Weinberg (Analog Dialog 33-1, January 1999), and confidential information owned by Days that qualifies as prior art under 35 U.S.C. § 102(g).

68. Therefore, Days is entitled to a judgment declaring that one or more claims of the ‘924 Patent is invalid.

**COUNT V**  
**Infringement by Lippert of the ‘693 Patent**

69. Paragraphs 1-50 are incorporated herein as set forth above.

70. Lippert manufactures, uses, sells, and offers for sale certain vehicle leveling systems, including, but not limited to, auto level systems for motor homes (the “Lippert System”).

71. The Lippert System will automatically level a vehicle, such as a motor home. The Lippert System comprises either four or six legs mounted to the vehicle. Each of the legs can be moved between a retracted, stowed position and an extended use position. When the vehicle is traveling, each of the legs is in the retracted, stowed position.

72. When the vehicle is parked, each of the legs can be extended to the extended use position to engage a ground surface.

73. The Lippert System has a sensor mounted to the vehicle that senses the pitch and roll of the vehicle relative to a level plane.

74. The sensor sends an orientation signal representing the pitch and roll to a controller. The controller monitors that signal and actuates one or more of the legs to move the vehicle relative to the ground surface until the vehicle reaches a reference level plane (*i.e.*, is level).

75. The controller includes memory for storing the reference level plane. The controller writes data representing the orientation signal to the memory to replace the reference level plane data with the orientation signal data.

76. Lippert does not have a license or permission to practice the claimed subject matter in the '693 Patent.

77. Lippert has directly infringed and continues to directly infringe the '693 Patent, literally or under the doctrine of equivalents, in violation of 35 U.S.C. § 271(a), by making, using, selling, and offering for sale its Level Up Towable RV Leveling System.

78. Lippert's infringement has been willful and deliberate.

79. Days has been injured and has been caused significant financial damage as a direct and proximate result of Lippert's infringement of the '693 Patent.

80. Days is entitled to recover from Lippert damages sustained by Days as a result of Lippert's wrongful acts in an amount subject to proof at trial.

81. Lippert's conduct will cause further irreparable injury to Days if Lippert is not restrained by this Court from further violation of Days' rights.

82. Days' remedy at law is not by itself adequate, and Days has suffered and continues to suffer irreparable harm such that Plaintiff is entitled to injunctive relief.

**COUNT VI**  
**Unfair Competition by Lippert under the Lanham Act**

83. Paragraphs 1-50 are incorporated herein as set forth above.

84. Lippert's accusations of patent infringement, if it truly does not own the Lippert Patents, constitute false designations of origin, false or misleading descriptions of fact, or false or misleading representations of fact.

85. Lippert's accusations of patent infringement, if it truly does not own the Lippert Patents, are likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of the Lippert Patents with another person, or as to the origin, sponsorship, or approval of Lippert's goods, services, or commercial activities by another person.

86. Lippert's accusations of patent infringement, if it truly does not own the Lippert Patents, constitute unfair competition under 15 U.S.C. § 1125.

87. Days is entitled to recover from Lippert damages sustained by Days as a result of Lippert's wrongful acts in an amount subject to proof at trial.

88. Lippert's conduct will cause further irreparable injury to Days if Lippert is not restrained by this Court from further violation of Days' rights.

89. Days' remedy at law is not by itself adequate, and Days has suffered and continues to suffer irreparable harm such that Plaintiff is entitled to injunctive relief.



**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff, DAYS CORPORATION requests the following relief individually, cumulatively, and/or alternatively:

- A. A declaratory judgment that Days does not infringe any asserted and valid claim of the '385 Patent;
- B. A declaratory judgment that Days does not infringe any asserted and valid claim of the '924 Patent;
- C. A declaratory judgement that the asserted claims of the '385 Patent are invalid under 35 U.S.C. §1, *et seq.*;
- D. A declaratory judgement that the asserted claims of the '924 Patent are invalid under 35 U.S.C. §1, *et seq.*;
- E. A judgment that Lippert has directly infringed, either literally or under the doctrine of equivalents, one or more claims of the '693 Patent;
- F. An order and judgment preliminarily and permanently enjoining Lippert and its officers, directors, agents, servants, employees, affiliates, attorneys, and all others acting in privity or in concert with them, and their parents, subsidiaries, divisions, successors, and assigns from further acts of infringement of the '693 Patent;
- G. A judgment awarding Days all damages adequate to compensate it for Lippert's infringement of the '693 Patent, and in no event less than a reasonable royalty for Lippert's acts of infringement, including all pre-judgment and post-judgment interest at the maximum rate permitted by law;
- H. A judgment awarding Days all damages, including treble damages, based on any infringement found to be willful, pursuant to 35 U.S.C. § 289 together with

prejudgment interest;

- I. A judgment awarding actual damages suffered by Days as a result of Lippert's unlawful conduct, in an amount to be proven at trial, as well as prejudgment interest as authorized by law;
- J. An order and judgment preliminarily and permanently enjoining Lippert and its officers, directors, agents, servants, employees, affiliates, attorneys, and all others acting in privity or in concert with them, and their parents, subsidiaries, divisions, successors, and assigns from asserting ownership of patents Lippert does not own;
- K. A judgment awarding Days all damages adequate to compensate it for Lippert's unfair competition under the Lanham Act, 15 U.S.C. § 1051, *et seq.*; and
- L. A judgment entering such other relief as this Court deems just and proper.

#### **DEMAND FOR JURY TRIAL**

Plaintiff, Days Corporation hereby demands trial by jury on all issues so triable.

Dated June 12, 2017

Respectfully submitted,

DAYS CORPORATION

/s/ Eric Dorkin

Eric Dorkin

CLARK HILL PLC

130 E. Randolph St., Suite 3900

Chicago, Illinois 60601

tel (312) 985-5900

fax (312) 985-5999

[edorkin@clarkhill.com](mailto:edorkin@clarkhill.com)

*Attorneys for Plaintiff, Days Corporation*

**Index of Exhibits**

- A. United States Patent No. 6,584,385
- B. United States Patent No. 6,885,924
- C. United States Patent No. 6,619,693
- D. September 19, 2016, Lippert Notice Email
- E. Lippert Claims Charts
- F. January 20, 2017 Days Response
- G. February 17, 2017 Lippert Reply
- H. Declaration of Jason Loose
- I. October 7, 2017 Second Lippert Notice Email
- J. October 24, 2017 email from Shawn Lewis
- K. Lippert Components on-line RV OEM Catalogue pages i and vii  
(<https://www.lci1.com/assets/content/OEM/oem-catalog.pdf>)
- L. Lippert Components Master Patent List

**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all counsel of record.

June 12, 2017

/s/Eric Dorkin