

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

**CV 23 - 0071**

Michael J. House, Inventor,  
Licensed Combustion Stationary Engineer  
1<sup>ST</sup> Class Unlimited HPWR,  
Environmentalist.

COMPLAINT FOR PATENT  
INFRINGEMENT

**DeARCY HALL, J.** JURY TRIAL DEMANDED

Plaintiff,

**POLLAK, M.J.**

V.

General Electric Company, GE Aviation a Subsidiary of General  
Electric Company, GE Aerospace a Subsidiary of General Electric Company,  
CFM International a Subsidiary of General  
Electric Company, a New York Corporation,  
American Airlines Group Incorporation., a  
Delaware Corporation, Southwest Airlines Co. a  
Texas Corporation, Delta Air lines Inc. a Delaware  
Corporation, United Airlines Holdings Inc. a Delaware  
Corporation, JetBlue Airways Incorporated, a Delaware  
Corporation, Spirit Airlines Inc. a Delaware  
Corporation, Eastern Airlines LLC. A Delaware  
Corporation.

Defendants.

Plaintiff Michael J. House, Inventor. (“Mr. House”), Complains and Alleges as Follows  
Against Defendants: General Electric Company, GE Aviation, GE Aerospace,  
CFM International, American Airlines Group Incorporated, Southwest Airlines Co., Delta Air  
Lines Inc., United Airlines Inc. JetBlue Airways Incorporated, Spirit Airlines Inc., Eastern  
Airlines LLC. (Collectively, “Defendants”), avers as follows:

### NATURE OF THE LAWSUIT

1. This is an action for patent infringement arising under the patent laws of the United States, Title 35, United States Code, including 35 U.S.C. §§ 271 and 281-285. This Court has Exclusive subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 138(a).
2. Mr. House revolutionized the market for all combustion devices. Mr. House's iconic U.S. Patented Invention Process known as ("Multi All Fuel Processor System and Method of Pretreatment For All Combustion Devices"). A Process System and Method for Pretreating All Fuels prior to Combustion of any Combustion device such as an engine in which fuel in A liquid state is contained in a high pressure chamber and superheated to a state of Elevated Temperature and Pressure. This Process Holds True For All Fuels and Combustion Devices. This Process Will allow ALL FUELS to burn more cleanly and efficiently and will promote optimum combustion making it a universal process that can be adapted to ALL New and existing needs for total energy use.
3. Mr. House communicated with GE Aviation and General Electric Company in 1998 while Patent Pending status with the U.S. Patent office. Mr. House Talked directly to Margaret M. Todd the head of Submitted ideas and staff engineer and Disclosed and sign letters of submission with direct access to Mr. Houses Method Invention Process. All letters of communication are documented through the U.S. Post Office certified and postmarked and dated proof shown in exhibit 2.
4. GE Aviation, GE Aerospace, CFM International and General Electric Company has systematically copied Mr. House's U.S. Patented Method Process invention and Made this process an integral part of their combustion devices new and existing from this date 1998 forward.

### PARTIES

5. Plaintiff Mr. House is an individual residing at 27855 California Dr. N.W., Lathrup Village, Michigan 48076.
6. On information and belief, defendant General Electric Company is a New York corporation having its principal place of business at 5 Necco St, Boston, MA 02210.

7. Defendant GE Aviation is New York Corporation having its principle place of business at 1 Neumann Way, Cincinnati, Ohio, 45215.
8. Defendant GE Aerospace is a New York Corporation having its principle place of business at 1 Neumann Way, Cincinnati, Ohio, 45215.
9. Defendant CFM International is a New York Corporation having its principle place of Business at 1 Neumann Way, Cincinnati, Ohio, 45215.
10. Defendant American Airlines Group Incorporated is a Delaware Corporation having its principle place of business at 4333 Amon Carter Blvd. Fort Worth, TX, 76155.
11. Defendant Southwest Airlines Co. is a Texas Corporation having its principle place of business at 2702 Love Field Dr., Dallas TX, 75235.
12. Defendant Delta Air Lines Inc. is a Delaware Corporation having its principle place of business at 1020 Cargo Service Rd., Atlanta, GA, 30337.
13. Defendant United Airlines Holdings Inc. is a Delaware Corporation having its principle place of business at 233 S Wacker Dr., Chicago, IL, 60606.
14. Defendant JetBlue Airways Incorporated is a Delaware Corporation having its principle place of business at 27-01 Queens Plaza North, Long Island, New York, 11101- 4020.
15. Defendant Spirit Airlines Inc. is a Delaware Corporation having its principle place of Business at 2800 Executive Way, Miramar, FL, 33025.
16. Defendant Eastern Airlines LLC. Is a Delaware Corporation having its principle place of Business 550 E Swedesford Rd. Ste 210 Wayne, PA. 19087 - 1620

#### JURISDICTION AND VENUE

17. This Court has jurisdiction over each of the Defendants.
18. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391, (b), 1391(c) and 1400(b)
19. The appropriateness of venue is evaluated as of the time the complaint is filed. At time this action is filed on December, 28, 2022 controlling Federal Circuit precedent in VE Holding Corp. v. Johnson Gas Appliance Co. 917 F.2d 1574 (Fed. Cir. 1990), held that venue was proper as to a corporate defendant in any judicial district in which that defendant is subject to personal jurisdiction.

20. This Court has jurisdiction over General Electric Company, GE Aviation, GE Aerospace, CFM International, American Airlines Group Incorporated, Southwest Airlines Co., Delta Air Lines Inc., United Airlines Holdings Inc., JetBlue Airways Incorporated, Spirit Airlines Incorporated and Eastern Airlines LLC. At least those defendants sold, Offered for sale, used, or imported infringing (Multi All Fuel Processor System And Method Of Pretreatment For All Combustion Devices) into this District, or caused the same through their affiliates or contractors.

21. General Electric Company, GE Aviation, GE Aerospace and GE CFM International has Committed acts of infringement in this District, including articles of incorporation address Filed in this District, Including the sale, offer for sale, use and/or importation of infringing Jet Engines, GE9x Jet Engines, GENx Jet Engines, GE CFM LEAP Jet Engines, GE CF6 Jet Engines, GE CFM56 Jet Engines, GE CF34 Jet Engines.

22. As of this filing of Complaint on December,28,2022 General Electric Company and Subsidiaries, GE Aviation, GE Aerospace and GE CFM International All have articles of Incorporation Filed in New York, The Secretary of State of New York is designated as the Agent of the Corporation upon whom process against it may be served and the Post Office Address to which the Secretary shall mail a copy of such process served upon him or her Give President, Litigation, General Electric Company, 5 Necco Street, Boston MA 02210. Secretary of State New York Department of State Office at One Commerce Plaza, 99 Washington Avenue, Albany, NY 12231. Making Venue proper.

23. Venue is proper as to CFM International 50/50 Franco- American joint venture Between GE Aviation and Safran Aircraft Engines pursuant to 28 U.S.C. § 1391, (b), (3) Because CFM International is a France corporation, is “a defendant not resident in the United States” and may be sued in any judicial district. Because CFM International transacts Business within this District and offers for sale, use and or/ importation of infringing Products in this District products that infringe on Mr. House’s Patent. In addition, venue is proper because CFM International conducts business at JFK International Airport and Mr.

House Suffered harm in this District. Moreover, a Substantial part of the events giving rise to the claims occurred in this District.

24. Venue is proper within this District under 28 U.S.C. § 1391, (b) and (c) because American Airlines Group Incorporation transacts business within this District and offers for Sale and use in this District products that infringe on Mr. House's patent. In addition, venue is proper because American Airlines Group Incorporation conducts business at JFK Airport By providing flights, those flights use jet engines sold by defendants GE Aviation, GE Aerospace and CFM International and those jet engines practice plaintiffs Method when used. Hanger 10 RM 100, Jamaica, NY, 11430. And Mr. House Suffered harm in this District. Moreover, a Substantial part of the events giving rise to the claims occurred in this District.

25. Venue is proper within this District under 28 U.S.C. § 1391, (b) and (c) because Southwest Airlines Co. transacts business within this District and offers for sale and use in this District products that infringe on Mr. House's patent. In addition, venue is proper because Southwest Airlines Co. conducts business at LaGuardia Airport, By providing flights, those flights use jet engines sold by defendants GE Aviation, GE Aerospace and CFM International and those jet engines practice plaintiffs Method when used at 280 East LaGuardia Airport, East Elmhurst NY 11379. And Mr. House Suffered harm in this District. Moreover, a Substantial part of The Events giving rise to the claims occurred in this District.

26. Venue is proper within this District under 28 U.S.C. § 1391, (b) and (c) because Delta Air lines Inc. transacts business within this District and offers for sale and use in this District Products that infringe on Mr. House's patent. In addition, venue is proper because Delta Air lines Inc. conducts business at JFK International Airport Terminal 4 Queens, NY 11430 And Mr. House Suffered harm in this District. Moreover, a Substantial part of the Events Giving rise to the claims occurred in this District.

27. Venue is proper within this District under 28 U.S.C. § 1391, (b) and (c) because United Airlines Holdings Inc. transacts business within this District and offers for sale

And use in this District Products that infringe on Mr. House's patent. In addition, venue is Proper because United Airlines Holdings Inc. conducts business at JFK International Airport Corporate office United Airlines Building, 71 Old Rockaway Blvd. New York 11430. And Mr. House Suffered harm in this District. Moreover, a substantial part of the Events Giving Rise to the claims occurred in this District.

28. Venue is proper within this District under 28 U.S.C. § 1391 (b) and (c) because JetBlue Airways Incorporated transacts business within this District and offers for sale and use in This District Products that infringe on Mr. House's patent. In addition, venue is Proper Because JetBlue Airways Incorporated conducts business at JFK International Airport Terminal,5, Jamaica, New York, 11422. And Mr. House Suffered Harm in this District. Moreover, a substantial part of the events Giving Rise to the claims occurred in this District.

29. Venue is proper within this District under 28 U.S.C. § 1391 (b) and (c) because Spirit Airlines Inc. transacts business within this District and offers for sale and use in This District Products that infringe on Mr. House's Patent. In addition, venue is proper Because Spirit Airlines Inc. conducts business at LaGuardia Airport, Terminal A, 94-00 Grand Central Pkwy. East Elmhurst NY. 11371. And Mr. House Suffered Harm in this District. Moreover, a substantial part of the events Giving Rise to claims occurred in this District.

30 .Venue is proper within this District under 28 U.S.C. § 1391 (b) and (c) because Eastern Airlines LLC. Transacts business within this District and offers for sale and use in this District Products that infringe on Mr. Houses Patent. In addition, venue is proper because Eastern Airlines Inc. conducts business at JFK International Airport 1 Central Terminal Area #26, Queens, NY, 11430. And Mr. House Suffered Harm in this District. Moreover, a Substantial part of the events Giving Rise to claims occurred in this District.

## FACTS

31. Mr. House is the owner of all rights, title and interest in United States Patent No.7,140,873("the '873 Patent"), entitled "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" issued by The United States Patent and Trademark Office on November 28, 2006, a copy of which is attached as Exhibit 1.
32. General Electric Company markets, produces, distributes, sells, uses and offers to sell in The United States and or imports into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" including for example, Jet Engines, GE9x Jet Engines, GENx Jet Engines, GE CFM Leap Jet Engines, GE CF6 Jet Engines, GE CFM56 Jet Engines, GE90 and GE CF34 Jet Engines.
33. GE Aviation Company markets, produces, distributes, sells, uses and/ or offers to sell in The United States and or imports into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" including for example Jet Engines, GE9x Jet Engines, GENx Jet Engines, GE CFM Leap Jet Engines, GE CF6 Jet Engines, GE CFM56 Jet Engines, GE90 and GE CF34 Jet Engines.
34. GE Aerospace markets, produces, distributes, sells, uses and/ or offers to sell or offers to sell in the United States and or imports into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" including for example Jet Engines, GE9x Jet Engines, GENx Jet Engines, GE CFM Leap Jet Engines, GE CF6 Jet Engines, GE CFM56 Jet Engines, GE90 and GE CF34 Jet Engines.
35. CFM International markets, produces, distributes, sells uses and/ or offers to sell in the United States and or imports into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" including for example CFM LEAP Jet Engines, CFM56 Jet Engines.

36. American Airlines Group Incorporation markets, produces, distributes, sells, uses and/ Or Offers to sell in the United States and/ or imports into the United States ‘873 Patent “MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES” Including for example General Electric Co. and Subsidiaries Jet Engines being used on Fleet Aircrafts, Boeing 737 CFM56 Jet Engines, Boeing 747 GENx Jet Engines, Boeing 767 GECF6 Jet Engines, Boeing 777 GE9x, GE90 Jet Engines, Boeing 787 GENx Jet Engines, A320 CFM56 Jet Engines, A330 GE CF6 Jet Engines. Boeing 737 MAX CFM LEAP Engines.
37. Southwest airlines Co. markets, produces, distributes, sells, uses and/ or offers to sell in the United States and/ or import into the United States ‘873 Patent “MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES” Including for example General Electric Co. and Subsidiaries Jet Engines being used on fleet Aircrafts, Boeing 737 Family CFM 56 Jet Engines, 737-700 6 CFM56 Jet Engines, 737-800 CFM56 Jet Engines, Boeing MAX 7 CFM LEAP Jet Engines, Boeing 737 Max 8 CFM LEAP Jet Engines.
38. Delta Air Lines Inc. markets, produces, distributes, sells uses and/ or offers to sell in the United States and/ or import into the United States ‘873 Patent “MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES” Including for example General Electric Co. and Subsidiaries Jet Engines being used on fleet Aircrafts Airbus and Boeing Family Aircrafts, Boeing 737 NG/ Max CFM LEAP Jet Engines, Airbus A319 CFM56 Jet Engines, A320 CFM56 Jet Engines, A321 CFM56 Jet Engines, A330 CF6 Jet Engines, Boeing 767 GE CF6 Jet Engines.
39. United Airlines Holdings Inc. markets, produces, distributes, sells uses and/ or offers to Sell in the United States and/ or import into the United States ‘873 Patent “MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES” Including for example General Electric Co. and Subsidiaries Jet Engines being used on fleet Aircrafts, Boeing 787 GENx and GE9x Jet Engines, Boeing 777 GE90 Jet Engines, Boeing 757 GE CF6 Jet Engines, EMB 170 & 175 GE



CF34 Jet Engines. Boeing 737's CFM LEAP & GE CFM56 Jet Engines.

40. JetBlue Airways Incorporated markets, produces, distributes, sell uses and/ or offers to Sell in the United States and/ or import into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" Including for example General Electric Co. and Subsidiaries Jet Engines being used on fleet Aircrafts, Airbus A320 CFM56 Jet Engines, Airbus 321 CFM56 Jet Engines, Embraer E190 GE CF34.
41. Spirt Airlines Inc. markets, produces, distributes, sell uses and/ or offers to sell in the United States and/ or import into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" Including for example General Electric Co. and Subsidiaries Jet Engines being used on fleet Aircrafts, Airbus A320 CFM56 Jet Engines, Airbus A321 CFM56 Jet Engines, Boeing 737 CFM56 Jet Engines.
42. Eastern Airlines LLC. Markets, produces, distributes sell uses and/ or offers to sell in The United States and/ or import into the United States '873 Patent "MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES" Including for example General Electric Co. and Subsidiaries Jet Engines being used on fleet Aircraft, Boeing 767 GE CF6 Jet Engines, Boeing 777 GE90 Jet Engines.

#### BACKGROUND

##### Mr. House's Intellectual Property Rights

##### Mr. House's Utility Process Patent

43. Mr. House has protected his innovative invention process and cutting-edge technologies Through a broad range of intellectual property rights. Among the patent that Mr. House has Been awarded a utility process patent listed below, attached as Exhibit 1, to which Mr. House owns all the rights, title, and interest.

Patent Number	Title
US 7,140,873 (the “873 Patent”)	MULTI ALL FUEL PROCESSOR SYSTEM AND METHOD OF PRETREATMENT FOR ALL COMBUSTION DEVICES

FIRST CLAIM FOR RELIEF

(Infringement of the ‘873 Patent by General Electric Company)

44. General Electric Company, makes, produces, distributes, uses, offers to sell, and/ or sells in The United States and or imports into The United States products that practice the invention ‘873 Patent, including, for example the Jet Engines, GE9x Jet Engines, GENx Jet Engines, GE CFM Leap Jet Engines, GE CF6 Jet Engines, GE CFM56 Jet Engines, GE 90 Jet Engines and GE CF34 Jet Engines. EXHIBITS,1,2,3,4,5,6,7,8,9,10 Are documentation of these infringements with EXHIBITS, 3, 4, Provided patent infringement claim charts produced professionally by 3<sup>rd</sup> party consultant.
45. General Electric Company has infringed and continues to infringe the ‘873 Patent Directly or through acts of contributory infringement or induced in violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the ‘873 Patent. Accordingly, General Electric Company used the jet engines they directly infringed the ‘873 Patent in violation of 35U.S.C. § 271 (a).  
General Electric Company induces infringement of the ‘873 Patent by encouraging its airline customers to use the jet engines despite knowing that any use of these jet engines is an infringement of the ‘873 Patent in violation of 35 U.S. C. § 271 (b).  
General Electric Company has contributed to the infringement of the ‘873 Patent By its airline customers by selling these jet engines which are not suitable for substantial non infringement use, because every use of these jet engines performs The Patented Method of The ‘873 Patent in violation of 35 U.S.C. § 271 (c).
46. General Electric Company’s infringement has occurred with knowledge of the

'873 Patent and has been willful.

47. Mr. House is informed and believes, and on that basis alleges, that General Electric Company has gained profits by virtue of its infringement of The '873 Patent.

48. General Electric Company's acts of infringement have caused damages to Mr. House, And Mr. House is entitled to recover from General Electric Company the damages sustained by Mr. House as a result of General Electric Company's wrongful acts.

### SECOND CLAIM FOR RELIEF

#### (Infringement of the '873 Patent by GE Aviation and GE Aerospace)

49. GE Aviation and GE Aerospace, makes, markets, produces, distributes, uses, offers To sell, and/ or sells in The United States and or imports into The United States products That practice the invention '873 Patent, including, for example the Jet Engines, GE9x Jet Engines, GENx Jet Engines, GE CFM Leap Jet Engines, GE CF6 Jet Engines, GE CFM56 Jet Engines, GE90 Jet Engines and GE CF34 Jet Engines. EXHIBITS,1,2,3,4,5,6,7,8,9,10 Are documentation of these infringements with EXHIBITS, 3, 4, Provided patent Infringement claim charts produced professionally by 3<sup>rd</sup> party Consultants.

50. GE Aviation and GE Aerospace has infringed and continues to infringe the '873 Patent Directly or through acts of contributory infringement or induced in violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the '873 Patent. Accordingly, GE Aviation and GE Aerospace used the jet engines they directly infringed the '873 Patent in violation of 35 U.S.C. § 271 (a).

GE Aviation and GE Aerospace induces infringement of the '873 Patent by encouraging its airline customers to use these jet engines despite knowing that any use of these jet engines is an infringement of the '873 Patent in violation of 35 U.S.C. § 271, (b).

GE Aviation and GE Aerospace has contributed to the infringement of the '873 Patent by its airline customers by selling these jet engines which are not suitable for substantial non

infringement use, because every use of these jet engines performs The Patent Method of The '873 Patent in violation of 35 U.S.C. § 271., (c).

51. GE Aviation and GE Aerospace's infringement has occurred with knowledge of the '873 Patent and has been willful.
52. Mr. House is informed and believes, and alleges, that GE Aviation and GE Aerospace Has gained profits by virtue of its infringement of The '873 Patent.
53. GE Aviation and GE Aerospace's act of infringement have caused damages to Mr. House, and Mr. House is entitled to recover from GE Aviation and GE Aerospace the Damages sustained by Mr. House as a result of GE Aviation and GE Aerospace's wrongful Acts.

### THIRD CLAIM FOR RELIEF

#### (Infringement of the '873 Patent by GE Aviation, GE Aerospace and CFM International)

54. GE Aviation, GE Aerospace, and CFM International, makes, markets, produces, Distributes, uses, offers to sell, and/ or sells in The United States and or imports into The United States products that practice the invention '873 Patent, including, for example the Jet Engines, CFM LEAP jet Engines, CFM56 Jet Engines. EXHIBITS, 1,2,3,4,5,6,7,8,9,10 Are documentation of these infringements with EXHIBITS, 3, 4, Provided patent infringement claim charts produced professionally by 3<sup>rd</sup> party Consultants.
55. GE Aviation, GE Aerospace and CFM International has infringed and continues to Infringe The '873 Patent directly or through acts of contributory infringement or induced In violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the '873 Patent. Accordingly, GE Aviation, GE Aerospace and CFM International used these jet engines they directly infringed the '873 Patent in violation of 35 U.S.C. § 271 (a).  
GE Aviation, GE Aerospace and CFM International induces infringement of the '873 Patent by encouraging its airline customers to use these jet engines despite knowing that any use of these jet engines is an infringement of the '873 Patent in violation of 35 U.S.C.

§271 (b).

GE Aviation, GE Aerospace and CFM International has contributed to the infringement of the '873 Patent by its airline customers by selling these jet engines which are not suitable for substantial non infringement use, because every use of these jet engine performs The Patented Method of The '873 Patent in violation of 35 U.S.C. § 271 (c).

56. GE Aviation, GE Aerospace and CFM International's infringement has occurred with Knowledge of The '873 Patent and has been willful.

57. Mr. House is informed and believes, and on that basis alleges, that GE Aviation, GE Aerospace and CFM International has gained profits by virtue of its infringement of The '873 Patent.

58. GE Aviation, GE Aerospace and CFM International's acts of infringement have caused damages to Mr. House, and Mr. House is entitled to recover from GE Aviation, GE Aerospace and CFM International the damages sustained by Mr. House as a result of GE Aviation, GE Aerospace and CFM international's wrongful acts.

#### FOURTH CLAIM FOR RELIEF

##### (Infringement of The '873 Patent by American Airlines Group Incorporation)

59. American Airlines Group Incorporation, makes, markets, produces, distributes, uses, offers To sell, and/ or sells in The United States and or imports into the United States products that Practice the invention '873 Patent, including, for example the Jet Engines being used on Fleet Aircrafts, Boeing 777 GE9x, GE90 Jet Engines, Boeing 787 GENx Jet Engines, Boeing 737 CFM56 Jet Engines, Boeing 747 GENx Jet Engines, Boeing 767 GE90 Jet Engines, A320 CFM56 Jet Engines, A330 GE90 Jet Engines. Exhibits, 1,2,3,4,5,6,7,8,9,10 are Documentation of these infringements with Exhibits, 3,4, provided patent infringement charts produced professionally by 3<sup>rd</sup> party Consultants.

60. American Airlines Group Incorporation has infringed and continues to infringe The '873 Patent directly or through acts of contributory infringement or induced in violation Of 35

U.S.C. § 271. Whenever jet engines are used they perform each and every step of The ‘873 Patent. Accordingly, American Airlines Group Incorporation used these jet engines they directly infringed the ‘873 Patent in violation of 35 U.S.C. § 271 (a).

61. American Airlines Group Incorporation’s infringement has occurred with knowledge Of The ‘873 Patent and has been willful.
62. Mr. House is informed and believes, and on that basis alleges, that American Airlines Group Incorporation has gained profits by virtue of its infringement of The ‘873 Patent.
63. American Airlines Group Incorporation’s acts of infringement have caused damages to Mr. House, is entitled to recover from American Airlines Group Incorporated the damages Sustained by Mr. House as a result of American Airlines Group wrongful acts.

#### FIFTH CLAIM FOR RELIEF

##### (Infringement of the “873 Patent by Southwest Airlines Co.)

64. Southwest Airlines Co., makes, markets, produces, distributes, uses, offers to sell, and/ Or sells in The United States and or imports into The United States products that practice The invention ‘873 Patent, including for example the Jet Engines being used on fleet Aircrafts, Boeing 737 Family CFM56 Jet Engines, Boeing 737-700 CFM56 Jet Engines, Boeing 737-800 CFM56 Jet Engines, Boeing MAX 7 CFM LEAP Jet Engines, Boeing 737 MAX 8 CFM LEAP Jet Engines, EXHIBITS, 1,2,3,4,5,6,7,8,9,10 are documentation of these Infringements with EXHIBITS, 3, 4, Provided patent infringement claim charts produced Professionally by 3<sup>rd</sup> party Consultants.
65. Southwest Airlines Co. has infringed and continues to infringe The ‘873 Patent directly Or through acts of contributory infringement or induced in violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the ‘873 Patent. Accordingly, Southwest Airlines Co. used these jet engines they directly infringed the ‘873 Patent in violation of U.S.C. 35 § 271 (a).

66. Southwest Airlines Co. infringement has occurred with knowledge of The '873 Patent And has been willful.

67. Mr. House is informed and believes, and on that basis alleges, that Southwest Airline Co. Has gained profits by virtue of its infringement of The '873 Patent.

68. Southwest Airlines Co. acts of infringement have caused damages to Mr. House, and Mr. House is entitled to recover from Southwest Airlines Co. the damages sustained by Mr. House as a result of Southwest Airlines Co.'s wrongful acts.

#### SIXTH CLAIM FOR RELIEF

##### (Infringement of The '873 by Southwest Airlines Co.)

69. Delta Air Lines Inc. makes, markets, produces, distributes, uses, offers to sell, and/ or Sells in The United States and or imports into The United States products that practice the Invention '873 Patent, including, for example the Jet Engines being used on fleet Aircrafts, Airbus and Boeing Family Aircrafts, Boeing 737 NG/ MAX CFM LEAP Jet Engines, Airbus A319 CFM56 Jet Engines, A320 CFM56 Jet Engines, A321 CFM56 Jet Engines, A330 CF6 Jet Engines, Boeing 767 GE CF6 Jet Engines. EXHIBITS,1,2,3,4,5,6,7,8,9,10 Are documentation of these infringements with EXHIBITS,3 4, Provided patent Infringement claim charts produced professionally by 3<sup>rd</sup> party Consultants. Southwest Airlines Co. has infringed and continues to infringe the '873 Patent directly Or through acts of contributory infringement or induced in violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the '873 patent. Accordingly, Southwest Airlines Co. used the jet engines they directly infringed the '873 Patent in violation of 35 U.S.C. § 271 (a).

70. Delta Airlines Inc. infringement has occurred with knowledge of The '873 Patent And has been willful.

71. Mr. House is informed and believes, and on that basis alleges, that Delta Air Lines Inc. Has gained profits by virtue of its infringement of The '873 Patent.

72. Delta Air Lines Inc. acts of infringement have caused damages to Mr. House, and Mr. House is entitled to recover from Delta Air Lines Inc. the Damages sustained by Mr. House as a result of Delta Air Lines Inc. wrongful acts.

SEVENTH CLAIM FOR RELIER

(Infringement of the ‘873 Patent by United Airlines Holdings Inc.)

73. United Airlines Holdings Inc., markets, produces, distributes, sells, uses and/ or offers to Sell in The United States and/ or imports into The United States products that practice the Invention ‘873 Patent, including for example the Jet Engines being used on fleet Aircrafts, Boeing 787 GENx and GE9x Jet Engines, EXHIBITS,1,2,3,4,5,6,7,8,9,10 are documentation Of these infringements with EXHIBITS, 3, 4, Provided patent infringement claim charts Produced professionally by 3<sup>rd</sup> party Consultants.

74. United Airlines Holdings Inc. has infringed and continues to infringe The ‘873 Patent Directly or through acts of contributory infringement or induced in violation of 35U.S.C. § 271. Whenever jet engines are used they perform each and every step of the ‘873 Patent. Accordingly, United Airlines Holdings Inc. used these jet engines they directly infringed the ‘873 Patent in violation of 35 U.S.C. § 271 (a).

75. United Airlines Holdings Inc.’s infringement has occurred with knowledge of the ‘873 Patent and has been willful.

76. Mr. House is informed and believes, and on that basis alleges, that United Airlines Holdings Inc. has gained profits by virtue of its infringement of The ‘873 Patent.

77. United Airlines Holdings Inc. acts of infringement have caused damages to Mr. House, And Mr. House is entitled to recover from United Airlines Holdings Inc. the damages Sustained by Mr. House as a result of United Airlines Inc. wrongful acts.

EIGHTH CLAIM FOR RELIEF

(Infringement of the ‘873 Patent by JetBlue Airways Incorporated)



78. JetBlue Airways Incorporated, makes, markets, produces, distributes, uses, offers to Sell, and/ or sells in The United States and or imports into The United States products

That practice The invention '873 Patent, including. For example the Jet Engines being used on fleet aircrafts, Airbus A320 CFM56 Jet Engines, Airbus A321 CFM56 Jet Engines, Embraer E190 GE CF34 Jet Engines, EXHIBITS, 1,2,3,4,5,6,7,8,9,10 are documentation Of these infringements with EXHIBITS, 3 ,4, Provided patent infringement claim charts Produced professionally by 3<sup>rd</sup> party Consultants.

79. JetBlue Airways Incorporated has infringed and continues to infringe The '873 Patent Directly or through acts of contributory infringement or induced in violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the '873 Patent. Accordingly, JetBlue Airways Incorporated used these jet engines they directly infringed the '873 Patent in violation of 35 U.S.C. § 271 (a).

80. JetBlue Airways Incorporated infringement has occurred with knowledge of The '873 Patent and has been willful.

81. Mr. House is informed and believes, and on the basis alleges, that JetBlue Airways Incorporated has gained profits by virtue of its infringement of The '873 Patent.

82. JetBlue Airways Incorporated acts of infringement have caused damages to Mr. House, And Mr. House is entitled to recover from JetBlue Airways Incorporated the damages sustained by Mr. House as a result of JetBlue Airways Incorporated wrongful acts.

#### NINTH CLAIM FOR RELIEF

##### (Infringement of the '873 Patent by Spirt Airlines Inc.)

83. Spirit Airlines Inc., makes, markets, produces, distributes, uses, offers to sell, and/ or Sells in The United States and or imports into The United States products that practice the Invention '873 Patent, including, for example the Jet Engines being used on fleet Aircrafts, Airbus A320 CFM56 Jet Engines, Airbus A321 CFM56 Jet Engines, Boeing 737 CFM56 Jet Engines. EXHIBITS, 1,2,3,4,5,6,7,8,9,10 are documentation of these infringements with

EXHIBITS, 3, 4, Provided patent infringement claim charts produced professionally by 3<sup>rd</sup> Party Consultants.

84. Spirit Airlines Inc., has infringed and continues to infringe The '873 Patent Directly or Through acts of contributory infringement or induced in violation of 35 U.S.C. § 271.

85. Whenever jet engines are used they perform each and every step of the '873 Patent. Accordingly, Spirit Airlines Inc. used the jet engines they directly infringed the '873 Patent in violation of 35 U.S.C. § 271 (a).

86. Spirit Airlines Inc. infringement has occurred with knowledge of The '873 Patent and has been willful.

87. Mr. House is informed and believes, and on the basis alleges, that Spirit Airlines Inc. Has gained profits by virtue of its infringement of The '873 Patent.

88. Spirit Airlines Inc. acts of infringement have caused damages to Mr. House, and Mr. House is entitled to recover from Spirit Air Lines Inc. the damages sustained by Mr. House As a result of Spirit Airlines Inc. wrongful acts.

#### TENTH CLAIM FOR RELIEF

##### (Infringement of the '873 Patent by Eastern Airlines LLC.)

89. Eastern Airlines LLC., makes, markets, produces, distributes, uses, offers to sell, and/ or Sells in The United States and or imports into The United States products that practice The Invention '873 Patent, including, for example the Jet Engines being used on fleet aircrafts, Boeing 767 GE CF6 Jet Engines, Boeing 777 GE90 Jet Engines. EXHIBITS, 1,2,3,4,5,6,7,8,9,10 ARE Documentation of these infringements with EXHIBITS, 3, 4, Provided patent infringement claim charts produced professionally by 3<sup>rd</sup> party Consultants.

90. Eastern Airlines LLC. Has infringed and continues to infringe the '873 Patent Directly Or through acts of contributory infringement or induced in violation of 35 U.S.C. § 271. Whenever jet engines are used they perform each and every step of the '873 Patent.

Accordingly, Eastern Airlines LLC. Used these jet engines they directly infringed the '873 Patent in violation of 35 U.S.C. § 271 (a).

91. Eastern Airlines LLC infringement has occurred with knowledge of the '873 Patent And has been willful. Mr. House is informed and believes, and on the basis alleges, that Eastern Airlines LLC.

Has gained profits by virtue of its infringement of the '873 Patent.

92. Eastern Airlines LLC. Acts of infringement have caused damages to Mr. House, And Mr. House is entitled to recover from Eastern Airlines LLC. The damages sustained by Mr. House as a result of Eastern Airlines LLC. Wrongful acts. Eastern Airlines LLC. Acts of infringement will continue to damage Mr. House causing irreparable Harm, for Which there is no adequate remedy at law, unless enjoined by The Court.

#### JURY TRIAL DEMAND

93. Pursuant to Rule 38, Fed. R. Civ. P., Mr. House demands a trial by jury on all issues set forth herein that are properly triable to a jury.

#### PRAYER FOR RELIEF

WHEREFORE, Plaintiff Mr. House respectfully request that The Court, to grant the Following relief and to enter judgement in favor of House as follows.

- A. A judgement that each of Defendants have directly, contributorily infringed and/ or Or induced the infringement of the '873 Patent;
- B. Awarding Mr. House damages adequate to compensate for injuries sustained as a Result of Defendants' infringement of the '873 Patent, but in no event less than a Reasonable royalty, together with interest thereon;
- C. Judgment that at least that at least Defendants General Electric Company, GE Aviation, GE Aerospace, CFM International, American Airlines Group Inc., Southwest Airlines Co., Delta Air Lines Inc., United Airlines Holdings Inc.,

JetBlue Airways Incorporated, Spirit Airlines Inc. and Eastern Airlines LLC

Have willfully infringed the '873 Patent and awarding treble damages;

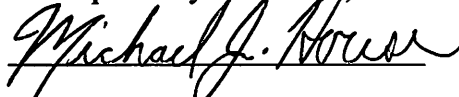
D. A judgement that this case is exceptional and an award of attorney fees and costs to

Mr. House pursuant to 35 U.S.C. § 285; and

E. Such other and further relief as the Court deems just and proper.

Dated: December, 28<sup>th</sup>, 2022

Respectfully Submitted,

By: 

Michael J. House

27855 California Dr. NW

Lathrup Village, MI. 48076

1-248-979-0332

Plaintiff Michael J House



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