

3. Shellef thus files this Complaint seeking judgement of and damages, injunctive, and other relief for Defendants' infringement of the '057 patent.

THE PARTIES

4. Shellef is a small company organized and incorporated in the State of New York, with its principal place of business located in Denton County, Texas.

5. On information and belief, CRC Industries is a private company incorporated in the state of Pennsylvania, with its principal place of business at 800 Enterprise Road Suite 101, Horsham, PA 19044.

6. On information and belief, Fastenal is a corporation incorporated in the state of Minnesota, with its principal place of business at 2001 Theurer Boulevard Winona, MN 55987.

7. On information and belief, Motion Indus. is a corporation incorporated in the state of Delaware, with its principal place of business located at 1605 Alton Road, Birmingham, AL 35210.

8. On information and belief, Rexel is a corporation incorporated in the state of Delaware, with its principal place of business at 5429 Lyndon B. Johnson Freeway, Suite 600, Dallas, TX 75240.

9. On information and belief, Grainger is a corporation incorporated in the state of Illinois, with its principal place of business at 100 Grainger Parkway, Lake Forest, Illinois 60045.

JURISDICTION AND VENUE

10. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§1331 and 1338, as this action arises under the Patent Laws of the United States (35 U.S.C. §1 *et seq.*).

A. CRC Industries

11. This Court has personal jurisdiction over CRC Industries pursuant to due process

and the Texas Long Arm Statute.


12. Personal jurisdiction exists over CRC Industries because it has sufficient minimum contacts in, has purposefully directed its activities at, the claim arises out of CRC Industries' activities with, has committed acts of infringement (a tort) in whole or in part in, and/or has engaged in continuous and systematic activities in the Western District of Texas. The Court's exercise of jurisdiction over CRC Industries would not offend traditional notions of fair play and substantial justice. CRC Industries conducts business in the State of Texas. For example, on information and belief, CRC Industries, directly or through intermediaries, makes, uses, sells, offers for sale, imports, advertises, makes available, and/or markets products and/or services within Texas, including in the Western District of Texas, that infringe one or more claims of the '057 patent. As another example, on information and belief, CRC Industries, for example, instructs or encourages U.S. customers and resellers, including, for example, Distributor Defendants, to use and resell products that infringe the '057 patent within Texas, including in this District. Further, on information and belief, CRC Industries has placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District.

13. On information and belief, CRC Industries has purposefully availed itself of the privilege of conducting business activities within the State of Texas, thus invoking the benefits and protections of the laws of the State of Texas.

14. For example, on information and belief, CRC Industries is registered or authorized to transact business in Texas and maintains an agent authorized to receive service of process within Texas. That agent is CT Corporation Systems, located at 1999 Bryan St. Suite 900, Dallas TX 75201:

Franchise Tax Details



Franchise Search Results		Public Information Report	
 As of : 09/12/2024 12:20:40			
<p>This page is valid for most business transactions but is not sufficient for filings with the Secretary of State</p> <p>Obtain a certification for filings with the Secretary of State.</p>			
CRC INDUSTRIES, INC.			
Texas Taxpayer Number	12321748571		
Mailing Address	800 ENTERPRISE RD STE 100 HORSHAM, PA 19044-3508		
Right to Transact Business in Texas	ACTIVE		
State of Formation	PA		
Effective SOS Registration Date	09/28/1981		
Texas SOS File Number	0005238206		
Registered Agent Name	C T CORPORATION SYSTEM		
Registered Office Street Address	1999 BRYAN ST. SUITE 900 DALLAS, TX 75201		

Close

15. Further, on information and belief, CRC Industries has previously admitted that it does business in the State of Texas:

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

STEPHENS E. MILLER and §
CYNTHIA MILLER §
VS. § CA NO. 1:06CV502
E.I. DU PONT DE NEMOURS §
AND COMPANY, INC., et. al. §

DEFENDANT CRC INDUSTRIES, INC.'S ANSWER

Defendant CRC Industries, Inc., hereinafter referred to as "CRC" or "this Defendant," by and through its counsel of record, files this Answer and respectfully shows the Court as follows:

I.

This Defendant is without sufficient information or belief to admit or deny the allegations of Paragraph A.1. of the Petition, and as such, the allegations are denied.

II.

This Defendant is without sufficient knowledge to admit or deny the allegations of Paragraph B.1. through Paragraph B.10. of the Petition, and as such, these allegations are denied.

III.

Defendant admits that it is a Pennsylvania corporation doing business in the State of Texas as alleged in Paragraph B.11. of the Petition.

DEFENDANT CRC INDUSTRIES, INC.'S ANSWER

Page 1

Defendant CRC Industries, Inc.'s Answer, *Miller v. E.I. Du Pont De Nemours & Co., Inc.*, No. 1:06-cv-00502 (E.D. Tex. Aug. 31, 2006), ECF No. 9 at 1.

16. In addition, upon information and belief, CRC Industries employs Senior Regional Sales Managers and requires those managers to live and work in the sales region they manage. Upon information and belief, CRC Industries has employees in the State of Texas, including Senior Regional Sales Managers who are residents of the State of Texas and who specifically and purposefully target customers and potential customers in their respective sales region in the State of Texas. *See, e.g.*, Ex. 2 (LinkedIn Profile for Forrest Brooks, Senior Sales Manager at CRC

Industries); Ex. 3 (LinkedIn Profile for Kim Crawford, Regional Sales Manager for CRC Industries); Ex. 4 (LinkedIn Profile for Scott Hodges, Director of Sales for CRC Industries). Upon information and belief, CRC Industries requires its Texas Regional Sales Managers to live and work in the sales region in Texas they manage.

17. As an example, upon information and belief, Forrest Brooks is a Senior Regional Sales Manager at CRC Industries and has been for about eight years. Ex. 2 at 1. During that time, Mr. Brooks has been residing and working for CRC Industries in Houston, at CRC Industries' request. *See id.* Upon information and belief, he specifically and purposefully targets customers and potential customers in Texas, including by selling and offering to sell CRC Industries' industrial degreasing products that are accused in this action of infringing the '057 patent, inducing customers to resell and/or use such products, and/or contributing to customers' infringement when they use such products.

18. As another example, upon information and belief, Karen Crawford is a Senior Regional Sales Manager at CRC Industries and has been for about eight years. Ex. 3 at 1. During that time, Ms. Crawford has been residing and working for CRC Industries in Austin, which is located in this District, at CRC Industries' request. *See id.* Upon information and belief, Ms. Crawford's sales region includes this District. Upon information and belief, she specifically and purposefully targets customers and potential customers in this District, including by selling and offering to sell CRC Industries' industrial degreasing products that are accused in this action of infringing the '057 patent, inducing customers to resell and/or use such products, and/or contributing to customers' infringement when they use such products.

19. As yet another example, upon information and belief, Scott Hodges is a Director of Sales at CRC Industries and has been for the past 5-6 months. Ex. 4 at 1. During that time, Mr. Hodges has been residing and working for CRC Industries in Bastrop, which is located in this

District, at CRC Industries' request. *See id.* On information and belief, before being promoted to Director of Sales, Mr. Hodges was the Western US Sales Manager from December 2016 to April 2024 and, during that time, he resided and worked for CRC Industries in Austin, which is located in this District, at CRC Industries' request. *See id.* Upon information and belief, Mr. Hodges specifically and purposefully targets customers and potential customers in this District, including by selling and offering to sell CRC Industries' industrial degreasing products that are accused in this action of infringing the '057 patent, inducing customers to resell and/or use such products, and/or contributing to customers' infringement when they use such products.

20. Venue is therefore proper in this District under 28 U.S.C. §1400(b) and 28 U.S.C. §1391(c) because, upon information and belief, CRC Industries has regular and established place of businesses in this District, including that CRC Industries has employees that are required to and do reside and work in this District, and has committed acts of infringement in this District.

B. Fastenal

21. This Court has personal jurisdiction over Fastenal pursuant to due process and the Texas Long Arm Statute.

22. Personal jurisdiction exists over Fastenal because it has sufficient minimum contacts in, has purposefully directed its activities at, the claim arises out of Fastenal's activities with, has committed acts of infringement (a tort) in whole or in part in, and/or has engaged in continuous and systematic activities in the Western District of Texas. The Court's exercise of jurisdiction over Fastenal would not offend traditional notions of fair play and substantial justice. Fastenal conducts business in the State of Texas. For example, on information and belief, Fastenal uses, sells, offers for sale, advertises, makes available, and/or markets products and/or services within Texas, including in the Western District of Texas, that infringe one or more claims of the '057 patent. As another example, on information and belief, Fastenal, for example, instructs or

encourages U.S. customers to use products that infringe the '057 patent, including in this District. Further, on information and belief, Fastenal has placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District.

23. On information and belief, Fastenal has purposefully availed itself of the privilege of conducting business activities within the State of Texas, thus invoking the benefits and protections of the laws of the State of Texas.

24. For example, on information and belief, Fastenal is registered or authorized to transact business in Texas and maintains an agent authorized to receive service of process within this District. That agent is Corporation Service Company, d/b/a, CSC-Lawyers Inco, located at 211 E. 7th Street, Suite 620, Austin TX 78701:

Franchise Tax Details

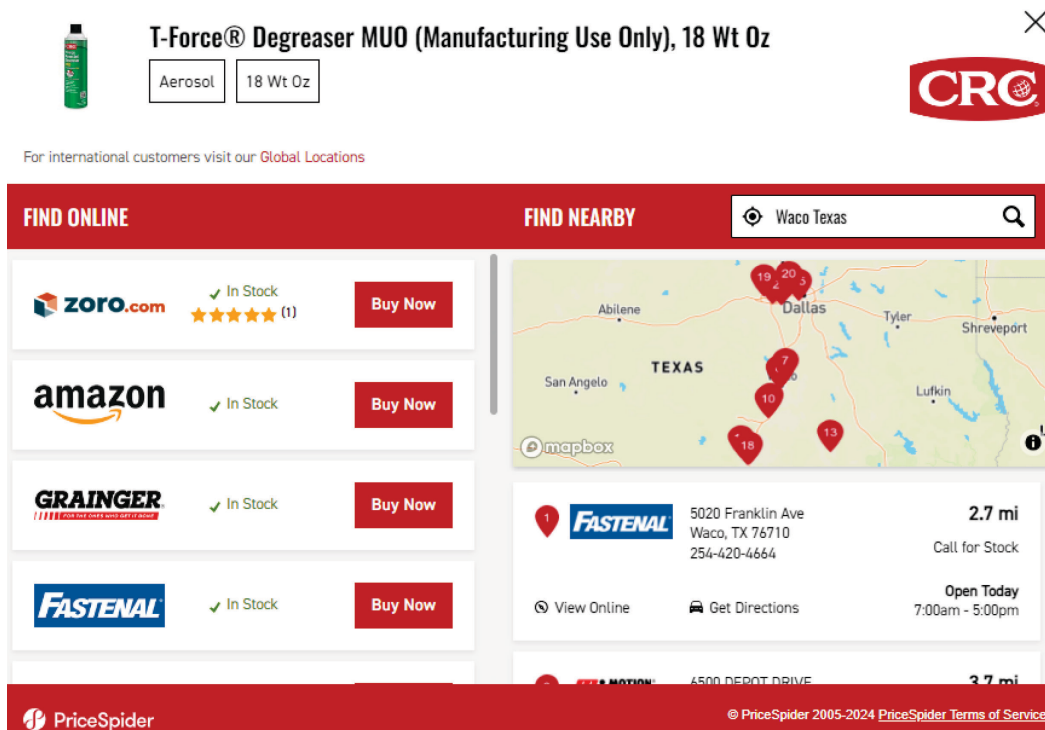


FASTENAL COMPANY	
Texas Taxpayer Number	14109484155
Mailing Address	2001 THEURER BLVD WINONA, MN 55987-1500
Right to Transact Business in Texas	ACTIVE
State of Formation	MN
SOS Registration Status (SOS status updated each business day)	ACTIVE
Effective SOS Registration Date	08/16/1991
Texas SOS File Number	0008858606
Registered Agent Name	CORPORATION SERVICE COMPANY D/B/A CSC-LAWYERS INCO
Registered Office Street Address	211 E. 7TH STREET, SUITE 620 AUSTIN, TX 78701

Close

25. On information and belief, Fastenal has and maintains retail locations and/or fulfillment centers in this District including, but not limited to: 5020 Franklin Avenue, Waco TX 76710; 6006 E Ben White Blvd Suite 100 Austin, TX; 927 Tony Lama St, Suite A & B, El Paso TX 79915; 1731 S San Marcos, Bldg 914, Suite 103, San Antonio TX; and 11220 Disco, San Antonio TX 78216. <https://www.fastenal.com/locations>.

26. On information and belief, Fastenal offers to sell and sells products that infringe the '057 patent in its retail locations and/or fulfillment centers in this District, including one or more of the products listed in paragraph 69. For example, Fastenal offers to sell and sells CRC Industries' T-Force® PowerJet® Degreaser at its retail location and/or fulfillment center that is located in Waco, which is in this District:



“Where to Buy” link at <https://www.crcindustries.com/t-force-degreaser-manufacturing-use-only/>.

27. Venue is therefore proper in this District under 28 U.S.C. §1400(b) and 28 U.S.C. §1391(c) because, upon information and belief, Fastenal has regular and established place of businesses in this District and has committed acts of infringement in this District.

C. Motion Indus.

28. This Court has personal jurisdiction over Motion Indus. pursuant to due process and the Texas Long Arm Statute.

29. Personal jurisdiction exists over Motion Indus. because it has sufficient minimum contacts in, has purposefully directed its activities at, the claim arises out of Motion Indus.'s activities with, has committed acts of infringement (a tort) in whole or in part in, and/or has engaged in continuous and systematic activities in the Western District of Texas. The Court's exercise of jurisdiction over Motion Indus. would not offend traditional notions of fair play and substantial justice. Motion Indus. conducts business in the State of Texas. For example, on information and belief, Motion Indus. uses, sells, offers for sale, advertises, makes available, and/or markets products and/or services within Texas, including in the Western District of Texas, that infringe one or more claims of the '057 patent. As another example, on information and belief, Motion Indus., for example, instructs or encourages U.S. customers to use products that infringe the '057 patent, including in this District. Further, on information and belief, Motion Indus. has placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District.

30. On information and belief, Motion Indus. has purposefully availed itself of the privilege of conducting business activities within the State of Texas, thus invoking the benefits and protections of the laws of the State of Texas.

31. On information and belief, Motion Indus. maintains an agent authorized to receive service of process within this District. That agent is CT Corporation Systems, located at 1999 Bryan St. Suite 900, Dallas TX 75201.

32. On information and belief, Motion Indus. has and maintains retail locations in this District including, but not limited to: 6500 Depot Drive, Waco, TX 76712; 16074 Central Commerce Drive, Bldg A103, Pflugerville, TX 78660; 8445 Gran Vista Drive, Ste. A, El Paso,

TX 79907; and 4536 Macro, San Antonio, TX 78218. <https://www.motion.com/about-mi/locations>.

33. On information and belief, Motion Indus. offers to sell and sells products that infringe the '057 patent in its retail locations in this District, including one or more of the products listed in paragraph 69. For example, Motion Indus. offers to sell and sells CRC Industries' T-Force® PowerJet® Degreaser in its retail location in Waco, which is in this District:

The screenshot displays the product page for T-Force® Degreaser MUO (Manufacturing Use Only), 18 Wt Oz. At the top, there is a product image and a search bar containing 'Waco Texas'. Below the search bar, a 'FIND NEARBY' section shows a map of Texas with several red location pins. A detailed view of a location in Waco, TX is provided, including the address 6500 DEPOT DRIVE, WACO, TX 76712, phone number 254-772-1119, and hours of operation (8:00am - 5:00pm). The page also features a 'FIND ONLINE' section with links to Zoro.com, Amazon, Grainger, and Fastenal, all marked as 'In Stock' with 'Buy Now' buttons. The PriceSpider logo and copyright information are visible at the bottom.

“Where to Buy” link at <https://www.crcindustries.com/t-force-degreaser-manufacturing-use-only/>.

34. Venue is therefore proper in this District under 28 U.S.C. §1400(b) and 28 U.S.C. §1391(c) because, upon information and belief, Motion Indus. has a regular and established place of businesses in this District and has committed acts of infringement in this District.

D. Rexel

35. This Court has personal jurisdiction over Rexel pursuant to due process and the Texas Long Arm Statute.

36. Personal jurisdiction exists over Rexel because it has sufficient minimum contacts in, has purposefully directed its activities at, the claim arises out of Rexel's activities with, has committed acts of infringement (a tort) in whole or in part in, and/or has engaged in continuous and systematic activities in the Western District of Texas. The Court's exercise of jurisdiction over Rexel would not offend traditional notions of fair play and substantial justice. Rexel conducts business in the State of Texas. For example, on information and belief, Rexel uses, sells, offers for sale, advertises, makes available, and/or markets products and/or services within Texas, including in the Western District of Texas, that infringe one or more claims of the '057 patent. As another example, on information and belief, Rexel, for example, instructs or encourages U.S. customers to use products that infringe the '057 patent, including in this District. Further, on information and belief, Rexel has placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District.

37. On information and belief, Rexel has purposefully availed itself of the privilege of conducting business activities within the State of Texas, thus invoking the benefits and protections of the laws of the State of Texas.

38. For example, on information and belief, Rexel is registered or authorized to transact business in Texas and maintains an agent authorized to receive service of process within this District. That agent is Corporation Service Company, d/b/a, CSC-Lawyers Inco, located at 211 E. 7th Street, Suite 620, Austin TX 78701:

Franchise Tax Details



Franchise Search Results

Public Information Report



As of : 09/24/2024 00:05:51

This summary page is designed to satisfy standard business needs. If you need to reinstate or terminate a business with the Texas Secretary of State, you must [obtain a certificate](#) specific to that purpose.

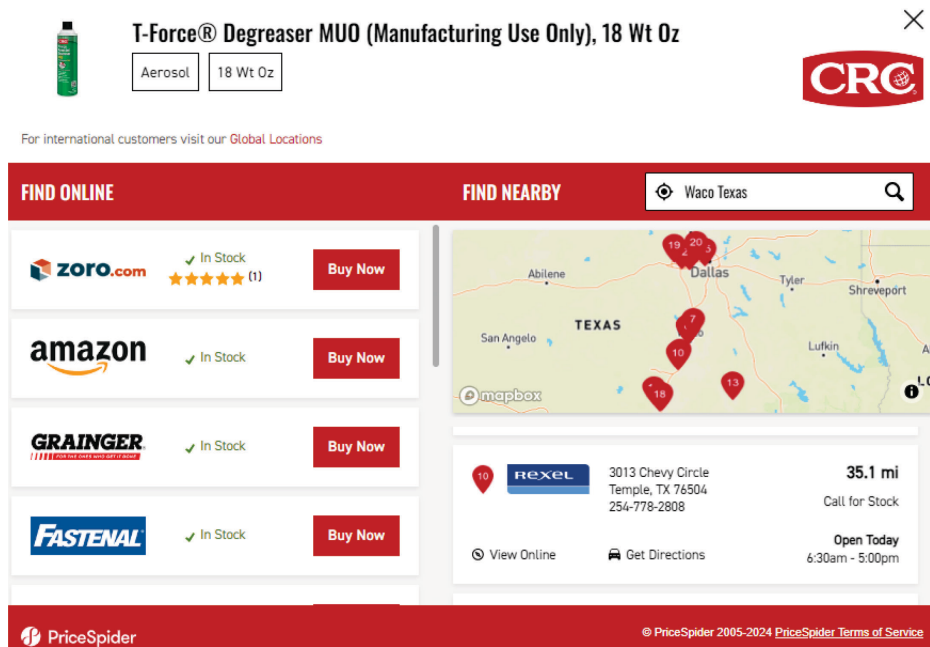
REXEL USA, INC.	
Texas Taxpayer Number	12050218457
Mailing Address	5429 LYNDON B JOHNSON FWY ATTN: TAX DEPT DALLAS, TX 75240-2607
Right to Transact Business in Texas	ACTIVE
State of Formation	DE
SOS Registration Status (SOS status updated each business day)	ACTIVE
Effective SOS Registration Date	06/21/2006
Texas SOS File Number	0800671542
Registered Agent Name	CORPORATION SERVICE COMPANY DBA CSC - LAWYERS INCO
Registered Office Street Address	211 E. 7TH STREET SUITE 620 AUSTIN, TX 78701

Close

39. On information and belief, Rexel has and maintains retail locations in this District including, but not limited to: 3013 Chevy Circle, Temple TX 76504; 2013 Centimeter Circle, Suite A, Austin, TX 78758; 6110 Trade Center Drive, Suite 101B, Austin, TX 78744; 7170 Industrial Avenue, El Paso, TX 79915; and 2400 Brockton Street, San Antonio, TX 78217.

40. On information and belief, Rexel offers to sell and sells products that infringe the '057 patent in its retail locations in this District, including one or more of the products listed in

paragraph 69. For example, Rexel offers to sell and sells CRC Industries' T-Force® PowerJet® Degreaser in its retail location in Temple, which is in this District:



“Where to Buy” link at <https://www.crcindustries.com/t-force-degreaser-manufacturing-use-only/>.

41. Venue is therefore proper in this District under 28 U.S.C. §1400(b) and 28 U.S.C. §1391(c) because, upon information and belief, Rexel has regular and established place of businesses in this District and has committed acts of infringement in this District.

E. Grainger

42. This Court has personal jurisdiction over Grainger pursuant to due process and the Texas Long Arm Statute.

43. Personal jurisdiction exists over Grainger because it has sufficient minimum contacts in, has purposefully directed its activities at, the claim arises out of Grainger's activities with, has committed acts of infringement (a tort) in whole or in part in, and/or has engaged in continuous and systematic activities in the Western District of Texas. The Court's exercise of jurisdiction over Grainger would not offend traditional notions of fair play and substantial justice. Grainger


conducts business in the State of Texas. For example, on information and belief, Grainger uses, sells, offers for sale, advertises, makes available, and/or markets products and/or services within Texas, including in the Western District of Texas, that infringe one or more claims of the '057 patent. As another example, on information and belief, Grainger, for example, instructs or encourages U.S. customers to use products that infringe the '057 patent, including in this District. Further, on information and belief, Grainger has placed or contributed to placing infringing products and/or services into the stream of commerce knowing or understanding that such products and/or services would be sold and used in the United States, including in this District.

44. On information and belief, Grainger has purposefully availed itself of the privilege of conducting business activities within the State of Texas, thus invoking the benefits and protections of the laws of the State of Texas.

45. For example, on information and belief, Grainger is registered or authorized to transact business in Texas and maintains an agent authorized to receive service of process within this District. That agent is Corporation Service Company, d/b/a, CSC-Lawyers Inco, located at 211 E. 7th Street, Suite 620, Austin TX 78701:

Franchise Tax Details



Franchise Search Results		Public Information Report
 As of : 09/25/2024 13:52:26		
<p>This summary page is designed to satisfy standard business needs. If you need to reinstate or terminate a business with the Texas Secretary of State, you must obtain a certificate specific to that purpose.</p>		
W. W. GRAINGER, INC		
Texas Taxpayer Number	13611502801	
Mailing Address	100 GRAINGER PARKWAY, TAX DEPT LAKE FOREST, IL 60045-5201	
Right to Transact Business in Texas	ACTIVE	
State of Formation	IL	
SOS Registration Status (SOS status updated each business day)	ACTIVE	
Effective SOS Registration Date	05/05/1934	
Texas SOS File Number	0000812106	
Registered Agent Name	CORPORATION SERVICE COMPANY D/B/A CSC-LAWYERS INCO	
Registered Office Street Address	211 E. 7TH STREET SUITE 620 AUSTIN, TX 78701	

Close

46. On information and belief, Grainger has and maintains retail locations in this District including, but not limited to: 6901 Imperial Dr, Waco, TX 76712; 6006 E. Ben White Blvd., Austin, TX 78741-7504; 7950 Research Blvd. Ste 101, Austin, TX 78758-8425; 1400 Lomaland Dr., El Paso, TX 79935-5207; 4110 S. County Rd. 1276 Midland, TX 79706-3042;

4924 NW Loop 410 San Antonio, TX 78229-5312; and 5011 Rittiman Rd. San Antonio, TX 78218-4638. <https://www.grainger.com/content/find-branch-location>.

47. On information and belief, Grainger offers to sell and sells products that infringe the '057 patent in its retail locations in this District, including one or more of the products listed in paragraph 69. For example, Grainger offers to sell and sells CRC Industries' T-Force® PowerJet® Degreaser in its retail location in Waco, which is in this District:

The screenshot displays the product page for T-Force® Degreaser MUO (Manufacturing Use Only), 18 Wt Oz. The product is shown as an aerosol can. The page includes a 'Buy Now' button and a 'Where to Buy' section. The 'Where to Buy' section features a map of Texas with several red location pins. A detailed view of a Grainger store in Waco, TX is shown, including the address (6901 Imperial Dr, Waco, TX 76712), phone number (800-472-4643), and store hours (8:00am - 5:00pm). The page also displays 'In Stock' status and 'Buy Now' buttons for various retailers like Zoro.com, Amazon, Grainger, and Fastenal.

“Where to Buy” link at <https://www.crcindustries.com/t-force-degreaser-manufacturing-use-only/>.

48. Venue is therefore proper in this District under 28 U.S.C. §1400(b) and 28 U.S.C. §1391(c) because, upon information and belief, Grainger has regular and established place of businesses in this District and has committed acts of infringement in this District.

BACKGROUND

A. Shellef

49. Shellef owns a portfolio of patents covering novel solvent formulations. Among Shellef's patents is the '057 patent.

50. The '057 patent resulted from the pioneering efforts of Mr. Edo Shellef, Mr. Dov Shellef, and Mr. Richard DeGroot (collectively "the Inventors") to make compositions that include trans-1,2-dichloroethylene ("t-DCE") nonflammable and more environmentally friendly.

51. t-DCE is an effective cleaner. However, before 2014, its use for cleaning purposes had been relatively limited because it is highly flammable. Prior methods to provide "nonflammable" t-DCE involved mixing t-DCE with compounds like hydrochlorofluorocarbons ("HCFCs") and hydrofluorocarbons ("HFCs"). The use of those compounds, however, has become highly disfavored because of their negative impact on the environment.

52. The '057 patent is directed to a class of novel non-flammable degreaser formulations that include t-DCE and other components. For example, the '057 patent discloses embodiments of formulations for solvent, non-azeotropic compositions that combine t-DCE with other components, e.g., HFE and/or n-propyl bromide, to achieve nonflammability.

53. Rendering t-DCE nonflammable is a significant benefit of the embodiments in the '057 patent. It allows consumers to take advantage of t-DCE's exceptional cleaning power and lower toxicity while keeping consumers safer. One or more of the disclosed embodiments in the '057 patent can be used in a variety of applications, including cleaning agents, degreasers, and solvents in industrial processes. They are compatible with a wide range of materials and processes, making them versatile for different industrial applications.

54. Another significant benefit of certain embodiments in the '057 patent is the use of HFE, which can avoid mixing t-DCE with ozone depleting compounds, such as HCFCs, and

greenhouse gases, like HFCs. One or more of the disclosed embodiments are also substantially less expensive to manufacture than other available alternatives.

B. Defendants

55. Upon information and belief, CRC Industries produces specialty chemicals for maintenance, repair and operational professionals and do-it-yourselfers, serving the automotive, industrial, electrical, marine, heavy truck, hardware and aviation markets. Among CRC's product offerings are branded cleaners, degreasers, and other cleaning solvents that incorporate two specific compounds relevant here: [1] t-DCE and [2] HFE, for example, HFE-347.

56. Those products include, for example, Cable Clean® Degreaser, Cable Clean® High Voltage Splice and Termination Cleaner, Lectra Force Electrical Cleaner, Contact Cleaner 2000® Precision Cleaner, NT® Precision Cleaner, Aviation T-Force® Degreaser, Contact Cleaner 2000® VC Precision Cleaner, T-Force® Degreaser MUO, and T-Force® PowerJet® Degreaser MUO.

57. Upon information and belief, Fastenal is a distributor and/or reseller of CRC Industries' products, including one or more of the products listed in paragraph 69. For example, Fastenal offers to sell and sells CRC® Cable Clean® High Voltage Splice and Termination Cleaner (<https://www.fastenal.com/product/details/0603822>) and T-Force® PowerJet® Degreaser MUO (<https://www.fastenal.com/product/details/0612726>).

58. Upon information and belief, Motion Indus. is a distributor and/or reseller of CRC Industries' products, including one or more of the products listed in paragraph 69. For example, Motion Indus. offers to sell and sells Cable Clean® Degreaser (<https://www.motion.com/products/sku/02420974;origin=sayt>), CRC® Cable Clean® High Voltage Splice and Termination Cleaner (<https://www.motion.com/products/sku/02420977;origin=sayt>), and T-Force® PowerJet® Degreaser MUO (<https://www.motion.com/products/sku/05679202;origin=sayt>).

59. Upon information and belief, Rexel is a distributor and/or reseller of CRC Industries' products, including one or more of the products listed in paragraph 69. For example, Rexel offers to sell and sells Cable Clean® Degreaser (<https://www.rexelusa.com/p/206135/crc/cable-clean-degreaser/078254020648/02064>) and CRC® Cable Clean® High Voltage Splice and Termination Cleaner (<https://www.rexelusa.com/p/54135/crc/high-voltage-cable-cleaner/078254020693/02069>).

60. Upon information and belief, Grainger is a distributor and/or reseller of CRC Industries' products, including one or more of the products listed in paragraph 69. For example, Grainger offers to sell and sells Cable Clean® Degreaser (<https://www.grainger.com/product/CRC-Electrical-Splice-Cleaner-1HBK2?opr=HPRVP>); CRC® Cable Clean® High Voltage Splice and Termination Cleaner (<https://www.grainger.com/product/CRC-Splice-Cleaner-Aerosol-Spray-4YPJ4>); and T-Force® PowerJet® Degreaser MUO (<https://www.grainger.com/product/CRC-Cleaner-Degreaser-Solvent-36C086>).

C. Notice of the '057 Patent and Shellef's Infringement Concerns

61. On November 17, 2023, Shellef's counsel sent a letter to Len Mazzanti, Chief Executive Officer of CRC Industries, notifying CRC Industries of the '057 patent and Shellef's concern that the industrial degreasing products being manufactured and/or sold by CRC Industries infringed the '057 patent, including those products identified above in paragraph 56. Shellef also notified CRC Industries of its concern that CRC Industries' customers infringe the '057 patent when they use or resale CRC Industries' industrial degreasing products.

62. The parties exchanged correspondence between December 2023 and June 2024 in effort to resolve this dispute via a patent license. They were unable to reach an agreement.

63. On July 5, 2024, CRC Industries filed a complaint for a declaratory judgment of non-infringement and invalidity of claims 1-20 of the '057 Patent in the United States District Court for the Eastern District of Pennsylvania. Complaint for Declaratory Judgment, *CRC Industries, Inc. v. Shellef Holdings, Inc.*, No. 2:24-cv-02952-KBH (E.D. Pa. July 5, 2024), ECF No. 1. On September 20, 2024, Shellef filed a motion to dismiss CRC Industries' declaratory judgment action for lack of personal jurisdiction pursuant to Federal Rule of Civil Procedure 12(b)(2). Motion to Dismiss Plaintiff's Complaint for Lack of Personal Jurisdiction and Brief In Support Thereof, *CRC Industries, Inc. v. Shellef Holdings, Inc.*, No. 2:24-cv-02952-KBH (E.D. Pa. Sept. 20, 2024), ECF Nos. 19, 19-1.

64. Distributor Defendants have had knowledge of the '057 patent and Shellef's concerns they were infringing that patent at least as of the filing and service of this complaint.

COUNT I – INFRINGEMENT OF U.S. PATENT NO. 9,816,057

65. The allegations set forth in the foregoing paragraphs 1 through 64 are incorporated as though fully set forth herein.

66. On November 14, 2017, the '057 patent was duly and legally issued by the United States Patent and Trademark Office under the title "Nonflammable Composition Containing 1,2-Dichloroethylene."

67. Shellef is the assignee and owner of all right, title and interest in and to the '057 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of said patent.

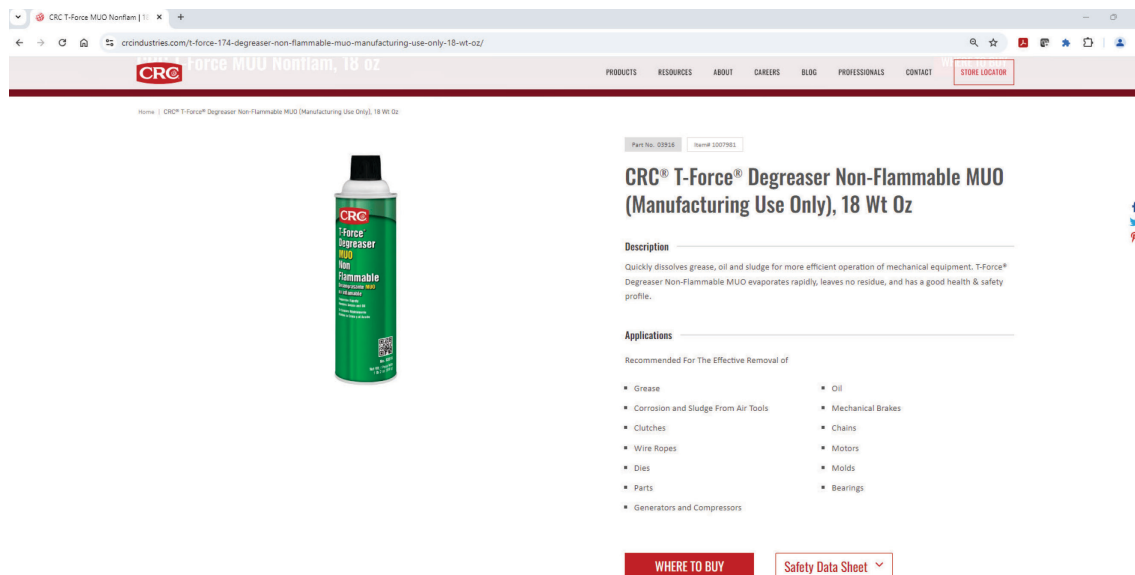
68. The '057 patent is valid and enforceable under the laws of the United States.

69. Defendants have directly infringed and continue to directly infringe one or more claims of the '057 patent, including at least claims 8 and 9, in violation of 35 U.S.C. §271 *et seq.*, by, among other things, making, using, selling, and/or offering to sell in the United States,

including in this District, products that can have a composition of at least 65 wt. % t-DCE and up to about 35 wt. % of HFE (“the Accused Products”). By way of example, the Accused Products are CRC Industries’ cleaning products, such as its Cable Clean® Degreaser, Cable Clean® High Voltage Splice and Termination Cleaner, Lectra Force Electrical Cleaner, Contact Cleaner 2000® Precision Cleaner, NT® Precision Cleaner, Aviation T-Force® Degreaser, Contact Cleaner 2000® VC Precision Cleaner, T-Force® Degreaser MUO, and T-Force® PowerJet® Degreaser MUO.

70. The Accused Products satisfy all claim limitations of one or more claims of the ’057 patent, including at least claims 8 and 9, either literally or under the doctrine of equivalents.

71. As an example, CRC Industries describes on its website that its T-Force® Degreaser MUO is a nonflammable degreaser that “[q]uickly dissolves grease, oil and sludge for more efficient operation of mechanical equipment.”



<https://www.crcindustries.com/t-force-174-degreaser-non-flammable-muo-manufacturing-use-only-18-wt-oz/>

72. The T-Force® Degreaser MUO meets every limitation of at least claim 8 of the ’057 patent, either literally or under the doctrine of equivalents. For example, in its safety data sheet for its T-Force® Degreaser MUO, CRC Industries specifies the product is a composition that

includes “trans-1,2-dichloroethylene” (t-DCE) between “60-70” percent and 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “20-30” percent. On information and belief, the T-Force® Degreaser MUO is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product identifier	T-Force® Degreaser MUO Non-Flammable - 1 lb 2 oz
Other means of identification	
Product Code	No. 03916 (Item# 1007981)
Recommended use	General purpose degreaser
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	
General Information	215-674-4300
Technical Assistance	800-521-3168
Customer Service	800-272-4620
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	www.crcindustries.com

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3. Composition/information on ingredients

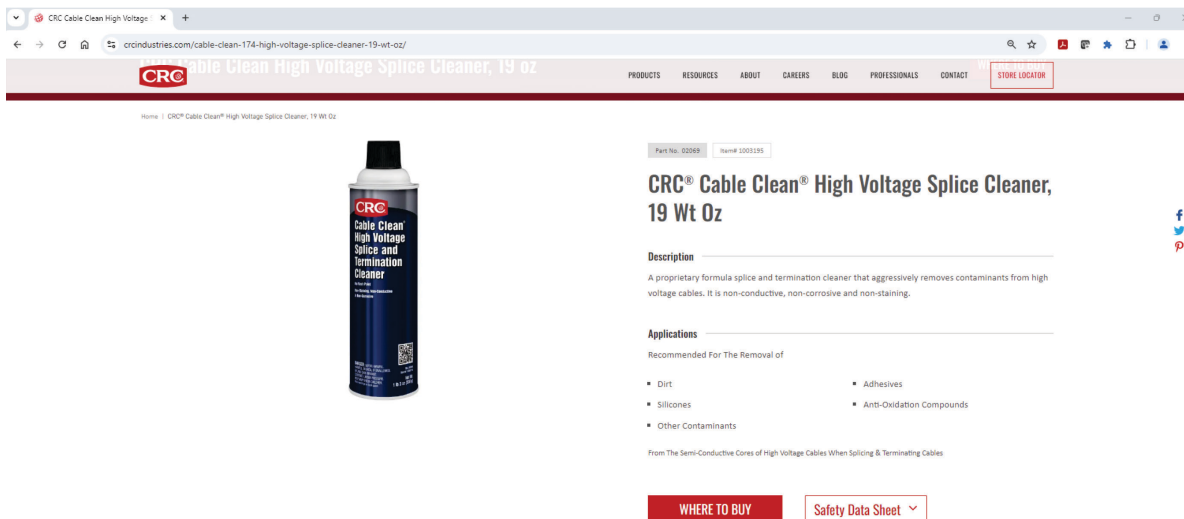
Mixtures

Chemical name	Common name and synonyms	CAS number	%
trans-1,2-dichloroethylene		156-60-5	60 - 70
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	20 - 30
carbon dioxide		124-38-9	3 - 5

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1007981.pdf.

73. As another example, CRC Industries describes on its website that its Cable Clean® High Voltage Splice and Termination Cleaner is a cleaner that “aggressively removes contaminants from high voltage cables.”



The screenshot shows a web browser window displaying the product page for CRC Cable Clean High Voltage Splice Cleaner. The browser address bar shows the URL: <https://www.crcindustries.com/cable-clean-174-high-voltage-splice-cleaner-19-wt-oz/>. The page header includes the CRC logo and navigation links: PRODUCTS, RESOURCES, ABOUT, CAREERS, BLOG, PROFESSIONALS, CONTACT, and a STORE LOCATOR button. The main content area features a product image of a blue and white spray can on the left. To the right of the image, the product name is displayed: **CRC® Cable Clean® High Voltage Splice Cleaner, 19 Wt Oz**. Below the name, there is a description: "A proprietary formula splice and termination cleaner that aggressively removes contaminants from high voltage cables. It is non-conductive, non-corrosive and non-staining." Under the "Applications" section, it lists "Recommended For The Removal of" with a bulleted list: Dirt, Silicones, Other Contaminants, Adhesives, and Anti-Oxidation Compounds. At the bottom of the page, there are two buttons: "WHERE TO BUY" and "Safety Data Sheet".

<https://www.crcindustries.com/cable-clean-174-high-voltage-splice-cleaner-19-wt-oz/>

74. The Cable Clean® High Voltage Splice and Termination Cleaner meets every limitation of at least claim 8 of the '057 patent, either literally or under the doctrine of equivalents. For example, in its safety data sheet for its Cable Clean® High Voltage Splice and Termination Cleaner, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “80-90” percent and 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “10-20” percent. On information and belief, the Cable Clean® High Voltage Splice and Termination Cleaner is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product identifier	Cable Clean® High Voltage Splice and Termination Cleaner - 1 lb 3 oz
Other means of identification	
Product Code	No. 02069 (Item# 1003195)
Recommended use	Splice and termination cleaner
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	
General Information	215-674-4300
Technical Assistance	800-521-3168
Customer Service	800-272-4620
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	www.crcindustries.com

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hydrogen fluoride, hydrogen chloride, and possibly phosgene.

3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
trans-1,2-dichloroethylene		156-60-5	80 - 90
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	10 - 20
carbon dioxide		124-38-9	3 - 5

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

4. First-aid measures

https://www.crcindustries.com/media/msdsen/msds_en-1003195.pdf.

75. As another example, CRC Industries describes its Cable Clean® Degreaser on its website as a degreaser that is nonflammable.

The screenshot shows the product page for CRC Cable Clean Degreaser, 18 oz. The page layout includes a dark red header with the CRC logo and navigation links (PRODUCTS, RESOURCES, ABOUT, CAREERS, BLOG, PROFESSIONALS, CONTACT, STORE LOCATOR). Below the header, the product name is prominently displayed. A product image of a blue spray can is shown on the left. To the right of the image, there is a 'Description' section with the following text: "Non-flammable formula helps prevent current leakage, excessive resistance, reduced performance & arcing by quickly removing contaminants. Not subject to the reporting requirements of RCRA, NSF K2 Registered." Below this is an 'Applications' section with a bullet point: "For Cable Cleaning: Semi-Conductive Cores of High Voltage Cables When Splicing & Terminating Cables". At the bottom of the product information, there are two buttons: "WHERE TO BUY" and "Safety Data Sheet".

<https://www.crcindustries.com/cable-clean-degreaser/>.

76. The Cable Clean® Degreaser meets every limitation of at least claim 8 of the '057 patent, either literally or under the doctrine of equivalents. For example, in its safety data sheet for its Cable Clean® Degreaser, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “60-70” percent and 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “20-30” percent. On information and belief, the Cable Clean Degreaser is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product Identifier Cable Clean® Degreaser - 1 lb 2 oz

Other means of identification

Product Code No. 02064 (Item# 1003191)

Recommended use Cable degreaser

Recommended restrictions None known.

Manufacturer/Importer/Supplier/Distributor information

Manufactured or sold by:

Company name CRC Industries, Inc.

Address 885 Louis Dr.
Warminster, PA 18974 US

Telephone

General Information 215-674-4300

Technical Assistance 800-521-3168

Customer Service 800-272-4620

**24-Hour Emergency
(CHEMTREC)** 800-424-9300 (US)

Website crcindustries.com

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3. Composition/information on ingredients

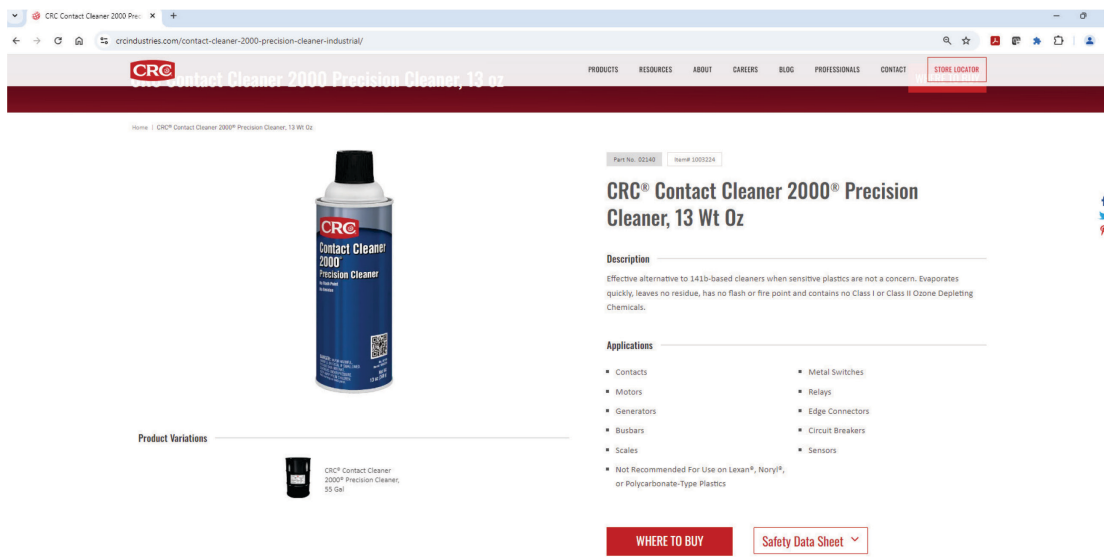
Mixtures

Chemical name	Common name and synonyms	CAS number	%
trans-1,2-dichloroethylene		156-60-5	60 - 70
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	20 - 30
carbon dioxide		124-38-9	3 - 5

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1003191.pdf.

77. As yet another example, CRC Industries describes on its website that its Contact Cleaner 2000® Precision Cleaner is a cleaner that “[e]vaporates quickly, leaves no residue, has no flash or fire point and contains no Class I or Class II Ozone Depleting Chemicals.”



<https://www.crcindustries.com/contact-cleaner-2000-precision-cleaner-industrial/>.

78. The Contact Cleaner 2000® Precision Cleaner meets every limitation of at least claim 8 of the '057 patent, either literally or under the doctrine of equivalents. For example, in its safety data sheet for its Contact Cleaner 2000® Precision Cleaner, CRC Industries specifies the product is a composition includes “trans-1,2-dichloroethylene” (t-DCE) between “60-70” percent and 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “20-30” percent. On information and belief, the Contact Cleaner 2000® Precision Cleaner is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product Identifier	Contact Cleaner 2000® Precision Cleaner - 13 oz
Other means of identification	
Product Code	No. 02140 (Item# 1003224)
Recommended use	Precision electronics cleaner
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	800-556-5074
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	crcindustries.com

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3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
trans-1,2-dichloroethylene		156-80-5	60 - 70
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	20 - 30
carbon dioxide		124-38-9	3 - 7

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/default/msds_en-1003224.pdf

79. As another example, CRC Industries describes on its website that its NTTM Precision Cleaner is a cleaner that “effectively removes dirt, light oils and other contaminants from electronic equipment. It evaporates quickly and leaves no residue. NTTM Precision Cleaner has no flash point and is an optimal alternative to HCFC 141b-based cleaners when sensitive plastics are not a concern.”

The screenshot shows the product page for CRC NT Precision Cleaner, 12 Wt Oz. The page includes a navigation menu with links for PRODUCTS, RESOURCES, ABOUT, CAREERS, BLOG, PROFESSIONALS, CONTACT, and STORE LOCATOR. The main content area features a large image of the product can, a description, and a list of applications. The description states: "NT Precision Cleaner effectively removes dirt, light oils and other contaminants from electronic equipment. It evaporates quickly and leaves no residue. NT Precision Cleaner has no flash point and is an optimal alternative to HCFC 141b-based cleaners when sensitive plastics are not a concern." The applications list includes: Contacts, Motors, Generators, Busbars, Scales & Sensors, Metal Switches, Relays, Edge Connectors, Circuit Breakers, and Not Recommended For Use on Lexan®, Noryl®, or Polycarbonate-Type Plastics. There are also buttons for "WHERE TO BUY" and "Safety Data Sheet".

<https://www.crcindustries.com/nt-8482-precision-cleaner-12-wt-oz-184/>.

80. The NTTM Precision Cleaner meets every limitation of at least claim 8 of the '057 patent, either literally or under the doctrine of equivalents. For example, in its safety data sheet for its NTTM Precision Cleaner, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “60-70” percent and 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,”

between “20-30” percent. On information and belief, the NT™ Precision Cleaner is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product identifier	NT™ Precision Cleaner - 12 oz
Other means of identification	
Product Code	No. 03205 (Item# 1003461)
Recommended use	Precision electronics cleaner
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	
General Information	215-674-4300
Technical Assistance	800-521-3168
Customer Service	800-272-4620
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	www.crcindustries.com

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3. Composition/information on ingredients

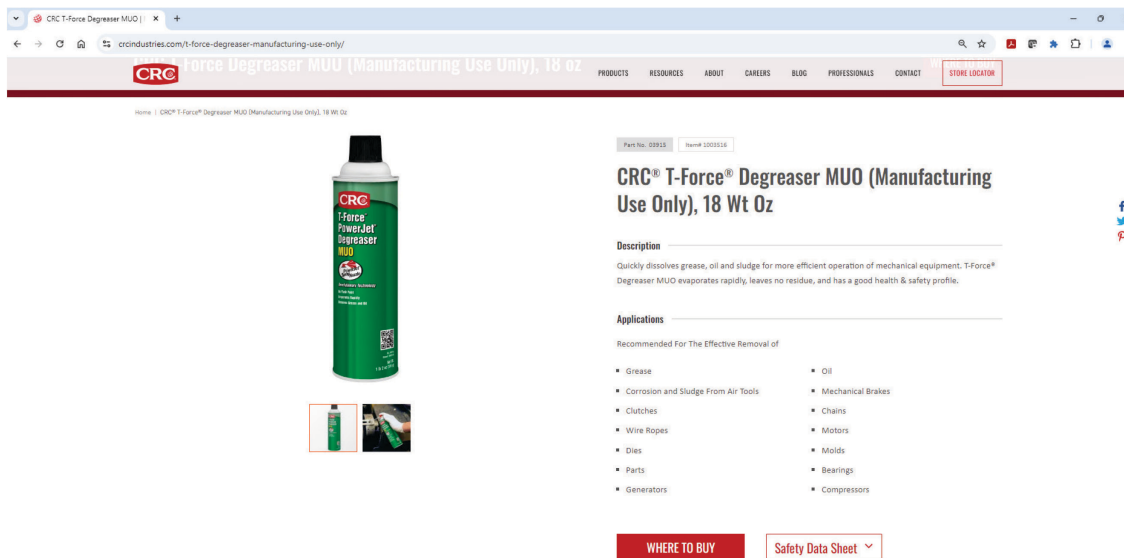
Mixtures

Chemical name	Common name and synonyms	CAS number	%
trans-1,2-dichloroethylene		156-60-5	60 - 70
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	20 - 30
carbon dioxide		124-38-9	3 - 5

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1003461.pdf.

81. As yet another example, CRC Industries describes on its website that its T-Force® PowerJet® Degreaser MUO is a degreaser that “[q]uickly dissolves grease, oil and sludge for more efficient operation of mechanical equipment.”



The screenshot shows the product page for CRC T-Force Degreaser MUO (Manufacturing Use Only), 18 Wt Oz. The page includes a navigation menu with links for PRODUCTS, RESOURCES, ABOUT, CAREERS, BLOG, PROFESSIONALS, CONTACT, and STORE LOCATOR. The main content area features a large image of the product can, a smaller image showing the product being used, and a detailed description and list of applications. The description states: "Quickly dissolves grease, oil and sludge for more efficient operation of mechanical equipment. T-Force® Degreaser MUO evaporates rapidly, leaves no residue, and has a good health & safety profile." The applications list includes: Grease, Corrosion and Sludge From Air Tools, Clutches, Wire Ropes, Dies, Parts, Generators, Oil, Mechanical Brakes, Chains, Motors, Molds, Bearings, and Compressors. At the bottom of the page, there are buttons for "WHERE TO BUY" and "Safety Data Sheet".

<https://www.crcindustries.com/t-force-degreaser-manufacturing-use-only/>

82. The T-Force® PowerJet® Degreaser MUO meets every limitation of at least claim 8 of the '057 patent, either literally or under the doctrine of equivalents. For example, in its safety data sheet for its T-Force® PowerJet® Degreaser MUO, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “80-90” percent and 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “10-20” percent. On information and belief, the T-Force® PowerJet® Degreaser MUO is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product Identifier	T-Force® PowerJet® Degreaser MUO - 1 lb 2 oz
Other means of identification	
Product Code	No. 03915 (Item# 1003516)
Recommended use	General purpose degreaser
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	
General Information	215-674-4300
Technical Assistance	800-521-3168
Customer Service	800-272-4620
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	www.crcindustries.com

* * *

3. Composition/information on ingredients

Mixtures

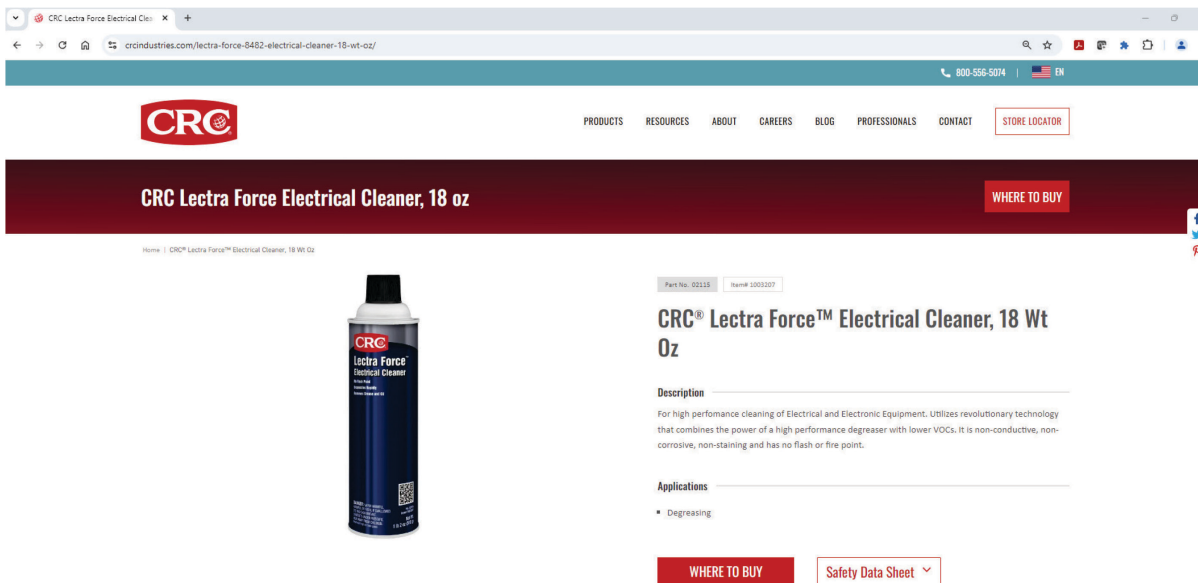
Chemical name	Common name and synonyms	CAS number	%
trans-1,2-dichloroethylene		156-60-5	80 - 90
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	10 - 20
carbon dioxide		124-38-9	3 - 5

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1003516.pdf

83. With knowledge of the '057 patent, Defendants have contributed and are contributing to infringement of one or more claims of the '057 patent, including at least claims 8 and 9, in violation of 35 U.S.C. §271 *et seq.*

84. As an example, CRC Industries describes on its website that its Lectra Force Electrical Cleaner is a “[f]or high performance [sic] cleaning of Electrical and Electronic Equipment.” It is “a high performance degreaser with lower VOCs. It is non-conductive, non-corrosive, non-staining and has no flash or fire point.”



<https://www.crcindustries.com/lectra-force-8482-electrical-cleaner-18-wt-oz/>.

85. In its safety data sheet for its Lectra Force Electrical Cleaner, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “40-50” percent, 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “5-10” percent, and 1,1,1,2-tetrafluoroethane, which “Common name and synonyms” is “R-134A,” between “40-50” percent. On information and belief, the Lectra Force Electrical Cleaner is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product identifier	Lectra Force™ - 1 lb 2 oz
Other means of identification	
Product Code	No. 02115 (Item# 1003207)
Recommended use	Electrical cleaner
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	
General Information	215-674-4300
Technical Assistance	800-521-3168
Customer Service	800-272-4620
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	www.crcindustries.com

* * *

3. Composition/information on ingredients**Mixtures**

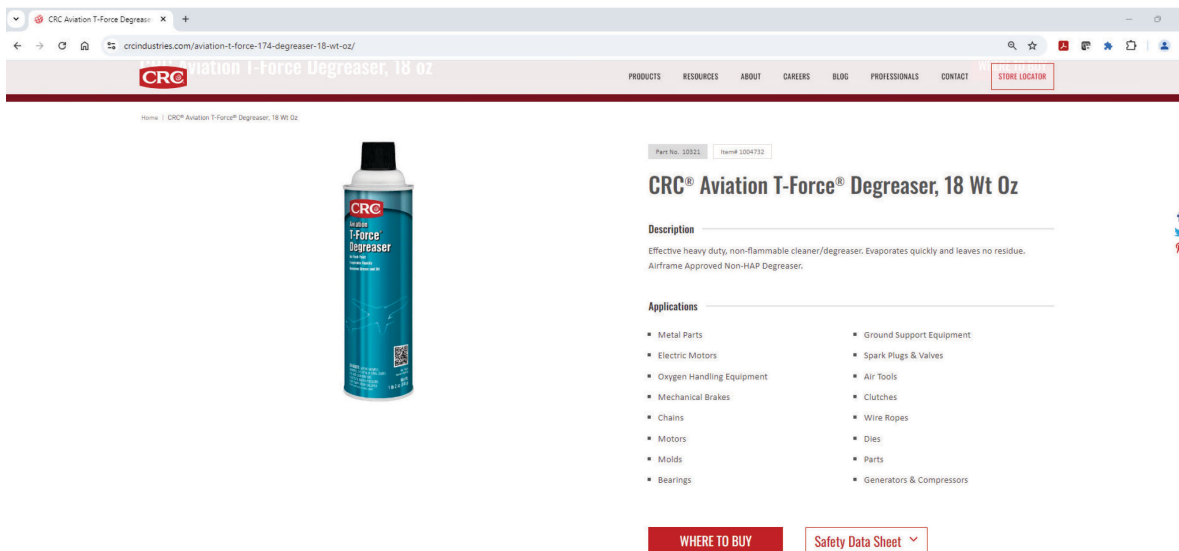
Chemical name	Common name and synonyms	CAS number	%
1,1,1,2-tetrafluoroethane	HFC-134A	811-97-2	40 - 50
trans-1,2-dichloroethylene		156-60-5	40 - 50
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	5 - 10
carbon dioxide		124-38-9	1 - 3

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1003207.pdf

86. On information and belief, when Lectra Force Electrical Cleaner is used for its intended purpose of cleaning (e.g., degreasing), it produces the solvent formulations of HFE-347 and t-DCE covered by at least claims 8 and 9 of the '057 patent. That is because the only other substantial component of this product, R-134a is a propellant that is not part of the degreasing product actually applied to surfaces to be cleaned. R-134A has a boiling point of -26.3 degrees Celsius, and is thus a gas at room temperature and pressure. Any R-134a propellant contained in the Lectra Force Electrical Cleaner can be immediately gasified upon release, leaving only the infringing HFE-347 and t-DCE formulation on the surface of the item to be cleaned. Users of Lectra Force Electrical Cleaner directly infringe the '057 patent, and Defendants, by selling a product without a substantial non-infringing use (e.g., a use for other than cold cleaning surfaces), contributorily infringe those claims.

87. As another example, CRC Industries describes on its website that its Aviation T-Force® Degreaser is a “[e]ffective heavy duty, non-flammable cleaner/degreaser. Evaporates quickly and leaves no residue. Airframe Approved Non-HAP Degreaser.”



<https://www.crcindustries.com/aviation-t-force-174-degreaser-18-wt-oz/>

88. In its safety data sheet for its Aviation T-Force® Degreaser, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “40-50” percent, 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “5-10” percent, and 1,1,1,2-tetrafluoroethane, which “Common name and synonyms” is “R-134A,” between “40-50” percent. On information and belief, the Aviation T-Force® Degreaser is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product Identifier	Aviation T-Force® Degreaser - 1 lb 2 oz
Other means of identification	
Product Code	No. 10321 (Item# 1004732)
Recommended use	General purpose degreaser for aviation applications
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	800-556-5074
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	crcindustries.com

* * *

3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
1,1,1,2-tetrafluoroethane	HFC-134A	811-97-2	40 - 50
trans-1,2-dichloroethylene		156-60-5	40 - 50
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	5 - 10
carbon dioxide		124-38-9	1 - 3

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1004732.pdf

89. On information and belief, when Aviation T-Force® Degreaser is used for its intended purpose of cleaning (e.g., degreasing), it produces the solvent formulations of HFE-347 and t-DCE covered by at least claims 8 and 9 of the '057 patent for the reasons explained above in paragraph 86 (incorporated herein by reference in its entirety). Users of Aviation T-Force® Degreaser directly infringe the '057 patent, and Defendants, by selling a product without a substantial non-infringing use (e.g., a use for other than cold cleaning surfaces), contributorily infringe those claims.

90. As another example, CRC Industries describes on its website that its Contact Cleaner 2000® VC Precision Cleaner is a “[e]ffective alternative to 141b-based cleaners when sensitive plastics are not a concern. Evaporates quickly, leaves no residue, has no flash or fire point and contains no Class I or Class II Ozone Depleting Chemicals.”

Part No. 00249 | Item # 002249

CRC® Contact Cleaner 2000® VC Precision Cleaner, 13 Wt Oz

Description

Effective alternative to 141b-based cleaners when sensitive plastics are not a concern. Evaporates quickly, leaves no residue, has no flash or fire point and contains no Class I or Class II Ozone Depleting Chemicals.

Applications

- Contacts
- Motors
- Generators
- Busbars
- Scales
- Metal Switches
- Relays
- Edge Connectors
- Circuit Breakers
- Sensors

• Not Recommended For Use on Lexan®, Noryl®, or Polycarbonate-Type Plastics

[WHERE TO BUY](#) [Safety Data Sheet](#)

<https://www.crcindustries.com/contact-cleaner-2000-174-vc-precision-cleaner-13-wt-oz/>

91. In its safety data sheet for its Contact Cleaner 2000® VC Precision Cleaner, CRC Industries specifies the product is a composition that includes “trans-1,2-dichloroethylene” (t-DCE) between “30-40” percent, 1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane,” which “Common name and synonyms” is “HFE-347PCF2,” between “10-20” percent, and 1,1,1,2-tetrafluoroethane, which “Common name and synonyms” is “R-134A,” between “40-50” percent. On information and belief, the Contact Cleaner 2000® VC Precision Cleaner is a non-azeotropic composition.



SAFETY DATA SHEET

1. Identification

Product Identifier	Contact Cleaner 2000® VC Precision Cleaner - 13 oz
Other means of identification	
Product Code	No. 02240 (Item# 1003249)
Recommended use	Precision electronics cleaner
Recommended restrictions	None known.
Manufacturer/Importer/Supplier/Distributor information	
Manufactured or sold by:	
Company name	CRC Industries, Inc.
Address	885 Louis Dr. Warminster, PA 18974 US
Telephone	
General Information	215-674-4300
Technical Assistance	800-521-3168
Customer Service	800-272-4620
24-Hour Emergency (CHEMTREC)	800-424-9300 (US)
Website	www.crcindustries.com

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3. Composition/information on ingredients

Mixtures

Chemical name	Common name and synonyms	CAS number	%
1,1,1,2-tetrafluoroethane	HFC-134A	811-97-2	40 - 50
trans-1,2-dichloroethylene		156-60-5	30 - 40
1,1,2,2-tetrafluoro-1-(2,2,2-trifluoroethoxy) ethane	HFE-347PCF2	406-78-0	10 - 20

Specific chemical identity and/or percentage of composition has been withheld as a trade secret.

https://www.crcindustries.com/media/msdsen/msds_en-1003249.pdf

92. On information and belief, when Contact Cleaner 2000® VC Precision Cleaner is used for its intended purpose of cleaning (e.g., degreasing), it produces the solvent formulations of HFE-347 and t-DCE covered by at least claims 8 and 9 of the '057 patent for the reasons

explained above in paragraph 86 (incorporated herein by reference in its entirety). Users of Contact Cleaner 2000® VC Precision Cleaner directly infringe the '057 patent, and Defendants, by selling a product to such uses without a substantial non-infringing use (e.g., a use for other than cold cleaning surfaces), contributorily infringe those claims.

93. Defendants have indirectly infringed and are indirectly infringing one or more claims of the '057 patent, including at least claims 8 and 9, in violation of 35 U.S.C. §271 *et seq.* With knowledge of the '057 patent and infringement thereof, Defendants have induced and are inducing their customers to directly infringe the '057 patent by directing, causing, instructing, and/or encouraging their customers to use the Accused Products, including to perform at least the method of claim 9 of the '057 patent. The use of the Accused Products, without authorization from Shellef, constitutes infringement, either literally or under the doctrine of equivalents, of one or more claims of the '057 patent, including at least claims 8 and 9, by such customers. *Supra* at ¶¶69-92 (incorporated herein by reference). For example, on information and belief, Defendants sell, directly or through an intermediate, the Accused Products to their customers. Defendants advertise that the Accused Products are degreasers. Degreasing is also known as cold cleaning. Defendants direct, cause, instruct, and/or encourage their customers to apply the Accused Products to a surface and spread or rub the Accused Products on the surface to cold clean the surface (degrease). Such use directly infringes at least claim 9 of the '057 patent, either literally or under the doctrine of equivalents, and Defendants are inducing that infringement.

94. With knowledge of the '057 patent and infringement thereof, CRC Industries has induced and is inducing its distributors and resellers, including the Distributor Defendants, to directly infringe the '057 patent by directing, causing, instructing, and/or encouraging its distributors and resellers to offer to sell and sell the Accused Products. The offer to sell and sale of the Accused Products, without authorization from Shellef, constitutes infringement, either

literally or under the doctrine of equivalents, of one more claims of the '057 patent, including at least claim 8, by such customers. *Supra* at ¶¶69-92 (incorporated herein by reference).

95. On information and belief, the Accused Products are used, marketed, provided to, and/or used by or for Defendants' partners, clients, customers, and end users across the country and in this District.

96. CRC Industries' infringement of the '057 patent has been and continues to be willful and deliberate. CRC Industries has been on notice of the '057 patent and its infringement thereof since at least November 17, 2023, when Shellef, through its counsel, notified Mr. Mazzanti, CEO of CRC Industries, of the '057 patent and Shellef's infringement concerns. Notwithstanding, on information and belief, CRC Industries has knowingly, deliberately and/or intentionally continued to engage in the above-described infringing acts despite a known or so obvious that it should have been known to CRC Industries that its conduct amounted to infringement of the '057 patent. CRC Industries' infringement is ongoing.

97. Distributor Defendants' infringement of the '057 patent has been and continues to be willful and deliberate. Each of those defendants have been on notice of the '057 patent and its infringement thereof at least as of the filing and service of this complaint. Notwithstanding, on information and belief, Distributor Defendants have each knowingly, deliberately and/or intentionally continued to engage in the above-described infringing acts despite a known or so obvious that it should have been known to each defendant that its conduct amounted to infringement of the '057 patent. Distributor Defendants' infringement is ongoing.

98. Shellef has been irreparably harmed by Defendants' infringing activities. It has suffered and will continue to suffer damages in an amount to be proved at trial.

JURY DEMAND

99. Pursuant to Rule 38 of the Federal Rules of Civil Procedure, Shellef demands a trial by jury on all issues triable as such.

PRAYER FOR RELIEF

100. WHEREFORE, Shellef prays for the following relief:

- a. A judgment that Defendants have directly infringed the '057 patent;
- b. A judgment that Defendants have induced infringement of the '057 patent;
- c. A judgment that Defendants have contributed to infringement of the '057 patent;
- d. An order enjoining Defendants, their officers, agents, employees, and those persons in active concert or participation with any of them, and Defendants' successors and assigns, from continuing to infringe the '057 patent;
- e. An award of damages pursuant to 35 U.S.C. §284 to be paid by Defendants adequate to compensate Shellef for Defendants' past infringement of the '057 patent, including supplemental damages for any infringing acts not covered by the jury's verdict, including any continuing post-verdict infringement up and until entry of final judgment, with an accounting of all infringing acts including, but not limited to, those acts not presented at trial;
- f. An order finding that Defendants' infringement has been willful and increasing the damages awarded to Shellef to three times the amount assessed pursuant to 35 U.S.C. § 284;
- g. A declaration that this case is exceptional under 35 U.S.C. §285, and an award of Shellef's reasonable attorneys' fees; and
- h. An award of Shellef's prejudgment and post-judgment interest on its damages;
- i. An award of Shellef's costs;
- j. An order awarding Shellef an ongoing royalty pursuant to 35 U.S.C. §283 for any continuing post-judgment infringement, with an accounting provided quarterly; and
- k. An award to Shellef of such further relief at law or in equity as the Court deems just and proper.

Dated: September 25, 2024

Respectfully submitted,

/s/ Domingo M. Llagostera

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