

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROUND ROCK RESEARCH, LLC,

Plaintiff,

v.

RICOH CO., LTD., RICOH IMAGING CO.,
LTD., RICOH AMERICAS CORP., RICOH
IMAGING AMERICAS CORP., and RICOH
ELECTRONICS, INC.,

Defendants.

Civil Action No. _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Round Rock Research, LLC (“Round Rock”), for its Complaint against Defendants Ricoh Co., Ltd., Ricoh Imaging Co., Ltd., Ricoh Americas Corp., Ricoh Imaging Americas Corp., and Ricoh Electronics, Inc., (collectively, “the Ricoh Defendants”), hereby alleges as follows:

The Parties

1. Plaintiff Round Rock is a Delaware limited liability company with its principal place of business at 2001 Route 46, Waterview Plaza, Suite 310, Parsippany, NJ 07054.

2. Upon information and belief, defendant Ricoh Co., Ltd. (“Ricoh Co.”) is a corporation organized and existing under the laws of Japan with its principal place of business at Ricoh Building, 8-13-1 Ginza, Chuo-ku, Tokyo 104-8222 Japan. Ricoh Co. is in the business of selling, supporting, producing, researching, and developing consumer and office electronics, for importation into the United States and sales in the United States, including in Delaware. Those

consumer and office electronics include but are not limited to digital copiers, facsimiles, multifunctional systems, scanners, printers, cameras, projectors, software, and related supplies.

3. Upon information and belief, defendant Ricoh Imaging Co., Ltd. (“Ricoh Imaging Co.”) is a corporation organized and existing under the laws of Japan with its principal place of business at 2-35-7, Maeno-cho, Itabashi-ku, Tokyo 174-8639 Japan. Ricoh Imaging Co. is in the business of selling, supporting, producing, researching, and developing Pentax-Ricoh brand digital cameras, binoculars, CCTV, and Machine-Vision lenses, and accessories, for importation into the United States and sales in the United States, including in Delaware.

4. Upon information and belief, defendant Ricoh Americas Corporation (“Ricoh Americas”) is a corporation organized under the laws of Delaware, having a principal place of business at 70 Valley Stream Parkway in Malvern, Pennsylvania. Ricoh Americas has appointed The Corporation Trust Company at Corporation Trust Center, 1209 Orange Street in Wilmington, Delaware as its registered agent for service of process in the state of Delaware. Ricoh Americas is in the business of distributing, importing, providing, marketing, selling, and servicing consumer and office electronics in the United States, including in Delaware. Those consumer and office electronics include but are not limited to digital copiers, facsimiles, multifunctional systems, scanners, printers, cameras, projectors, software, and related supplies.

5. Upon information and belief, defendant Ricoh Imaging Americas Corp., (“Ricoh Imaging Americas”) is a corporation organized under the laws of Delaware, having a principal place of business at 633 17th Street, Suite 2600, Denver, CO 80202. Ricoh Imaging Americas has appointed The Corporation Trust Company at Corporation Trust Center, 1209 Orange Street in Wilmington, Delaware as its registered agent for service of process in the state of Delaware. Ricoh Imaging Americas is in the business of selling, marketing, importing, and servicing

Pentax-Ricoh brand digital cameras, binoculars, CCTV, and Machine-Vision lenses, and accessories, in the United States, including in Delaware.

6. Upon information and belief, defendant Ricoh Electronics, Inc. (“REI”) is a corporation organized under the laws of California, having a principal place of business at 1100 Valencia Avenue, Tustin, California. REI is in the business of manufacturing office equipment and consumables in the United States for sale in the United States and internationally. Those office equipment and consumables include but are not limited to digital copiers, peripherals, printed circuit boards, thermal media, toner, parts, recycled toner cartridges, and customer configured products.

7. Upon information and belief, Ricoh Imaging Co. is a wholly owned subsidiary of Ricoh Co.

8. Upon information and belief, Ricoh Americas is a wholly owned subsidiary of Ricoh Co.

9. Upon information and belief, Ricoh Imaging Americas is a wholly owned subsidiary of Ricoh Imaging Co.

10. Upon information and belief, REI is a wholly owned subsidiary of Ricoh Co.

Nature Of The Action

11. This is a civil action for infringement of U.S. Patent Nos. 5,986,347 (“the ’347 patent”) (attached as Exhibit A), 6,147,405 (“the ’405 patent”) (attached as Exhibit B), 6,358,801 (“the ’801 patent”) (attached as Exhibit C), 6,455,935 (“the ’935 patent”) (attached as Exhibit D), and 6,828,683 (“the ’683 patent”) (attached as Exhibit E) (collectively, the “Patents-in-Suit”) under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

Jurisdiction And Venue

12. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331 and 1338(a) because this action arises under the patents laws of the United States, including 35 U.S.C. § 271 *et seq.*

13. This Court has personal jurisdiction over the Ricoh Defendants because, among other things, the Ricoh Defendants have committed, aided, abetted, contributed to, and/or participated in the commission of patent infringement in violation of 35 U.S.C. § 271 in this judicial district and elsewhere that led to foreseeable harm and injury to Round Rock.

14. This Court also has personal jurisdiction over the Ricoh Defendants because, among other things, the Ricoh Defendants have established minimum contacts within the forum such that the exercise of jurisdiction over the Ricoh Defendants will not offend traditional notions of fair play and substantial justice. For example, the Ricoh Defendants have placed products that practice and/or embody the claimed inventions of the Patents-in-Suit into the stream of commerce with the reasonable expectation and/or knowledge that purchasers and users of such products were located within this district. In addition, the Ricoh Defendants have sold, advertised, marketed, and distributed products in this district that practice the claimed inventions of the Patents-in-Suit. The Ricoh Defendants derive substantial revenue from the sale of infringing products distributed within the district, and/or expect or should reasonably expect their actions to have consequences within the district, and derive substantial revenue from interstate and international commerce.

15. In addition, the Ricoh Defendants knowingly, actively induced and continue to knowingly actively induce infringement of one or more of the Patents-in-Suit within this district by making, using, offering for sale, and selling infringing products, as well as by contracting

with others to use, market, sell, and offer to sell infringing products, all with knowledge of the asserted Patents-in-Suit, and their claims, with knowledge that their customers will use, market, sell, and offer to sell infringing products in this district and elsewhere in the United States, and with the knowledge and specific intent to encourage and facilitate infringing sales and use of the products by others within this district and the United States by creating and disseminating promotional and marketing materials, instructional materials, and product manuals, and technical materials related to the infringing products.

16. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b), 1391(c), and 1400(b), because the Ricoh Defendants are subject to personal jurisdiction in this district and have committed acts of infringement in this district.

The Patents-In-Suit

17. United States Patent No. 5,986,347 (“the ’347 patent”), titled “Processing Methods Of Forming Contact Openings And Integrated Circuitry,” was duly and legally issued by the U.S. Patent and Trademark Office on November 16, 1999. A copy of the ’347 patent is attached hereto as Exhibit A. Round Rock is the assignee of all rights, title, and interest in the ’347 patent, and it possesses all rights to sue and recover for any current or past infringement of the ’347 patent.

18. United States Patent No. 6,147,405 (“the ’405 patent”), titled “Asymmetric, Double-Sided Self-Aligned Silicide And Method Of Forming the Same,” was duly and legally issued by the U.S. Patent and Trademark Office on November 14, 2000. A copy of the ’405 patent is attached hereto as Exhibit B. Round Rock is the assignee of all rights, title, and interest in the ’405 patent, and it possesses all rights to sue and recover for any current or past infringement of the ’405 patent.

19. United States Patent No. 6,358,801 (“the ’801 patent”), titled “Method And Apparatus For Trench Isolation Process With Pad Gate And Trench Edge Spacer Elimination,” was duly and legally issued by the U.S. Patent and Trademark Office on March 19, 2002. A copy of the ’801 patent is attached hereto as Exhibit C. Round Rock is the assignee of all rights, title, and interest in the ’801 patent, and it possesses all rights to sue and recover for any current or past infringement of the ’801 patent.

20. United States Patent No. 6,455,935 (“the ’935 patent”), titled “Asymmetric, Double-Sided Self-Aligned Silicide,” was duly and legally issued by the U.S. Patent and Trademark Office on September 24, 2002. A copy of the ’935 patent is attached hereto as Exhibit D. Round Rock is the assignee of all rights, title, and interest in the ’935 patent, and it possesses all rights to sue and recover for any current or past infringement of the ’935 patent.

21. United States Patent No. 6,828,683 (“the ’683 patent”), titled “Semiconductor Devices, And Semiconductor Processing Methods,” was duly and legally issued by the U.S. Patent and Trademark Office on December 7, 2004. A copy of the ’683 patent is attached hereto as Exhibit E. Round Rock is the assignee of all rights, title, and interest in the ’683 patent, and it possesses all rights to sue and recover for any current or past infringement of the ’683 patent.

COUNT I

Infringement of U.S. Patent No. 5,986,347

22. Paragraphs 1 through 21 are incorporated by reference as if fully stated herein.

23. The ’347 patent is valid and enforceable.

24. The Ricoh Defendants have infringed, and continue to infringe, one or more claims of the ’347 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or

importing into the United States, products encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing into the United States all digital cameras, printers, copiers, projectors, and other consumer or office electronics incorporating one or more semiconductor components manufactured using 90nm or later (smaller) fabrication technology, including but not limited to, all digital cameras incorporating a Pentax PRIME image processor (e.g., Pentax K-01 digital SLR cameras and Pentax K500 digital SLR cameras), all digital cameras incorporating a Pentax PRIME II image processor (e.g., Pentax K-3 digital SLR cameras), all printers and other office products incorporating a Ricoh B2297180 processor (e.g., Ricoh Aficio SP4110N printers), and all projectors and other office products incorporating a Marvell 88E1518-NNB2 transceiver (e.g., Ricoh WX4141N projectors) (collectively, “the ’347 Infringing Products”).

25. The Ricoh Defendants’ customers (e.g., distributors, retailers, and online vendors) and Ricoh Americas and Ricoh Imaging Americas directly infringe one or more claims of the ’347 patent under 35 U.S.C. § 271(a) by selling, offering to sell, or importing the ’347 Infringing Products in the United States. The Ricoh Defendants have actively induced infringement of, and continue to actively induce infringement of, one or more claims of the ’347 patent under 35 U.S.C. § 271(b), either literally and/or under the doctrine of equivalents, by selling, importing, and/or offering for sale the ’347 Infringing Products to its customers and/or Ricoh Americas and/or Ricoh Imaging Americas with the knowledge of the ’347 patent and its claims, with knowledge that its customers will sell, offer to sell, and/or import into the United States the ’347 Infringing Products, and with knowledge and specific intent to encourage and facilitate those infringing sales of the ’347 Infringing Products through distributing the products to retailers, distributors, and online vendors and creating and disseminating promotional and marketing

materials, instructional manuals, product manuals and other technical materials related to the '347 Infringing Products.

26. The Ricoh Defendants have had knowledge of '347 patent and their infringement of that patent since at least February 6, 2015 through a letter sent by Round Rock concerning that infringement.

27. The Ricoh Defendants have infringed, and continue to infringe, at least claims 1, 2, 3, 4, 5, and/or 6 of the '347 patent.

28. Round Rock has been and continues to be damaged by the Ricoh Defendants' infringement of the '347 patent.

29. The Ricoh Defendants have willfully infringed, and continue to willfully infringe, the '347 patent despite having knowledge of the '347 patent at least through Round Rock's February 6, 2015 letter concerning their infringement.

30. The Ricoh Defendants' conduct in infringing the '347 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT II

Infringement of U.S. Patent No. 6,147,405

31. Paragraphs 1 through 30 are incorporated by reference as if fully stated herein.

32. The '405 patent is valid and enforceable.

33. The Ricoh Defendants have infringed, and continue to infringe, one or more claims of the '405 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing into the United States all digital

cameras, printers, copiers, projectors, and other consumer or office electronics incorporating one or more semiconductor components manufactured using 90nm or later (smaller) fabrication technology, including but not limited to, all digital cameras incorporating a Pentax PRIME image processor (e.g., Pentax K-01 digital SLR cameras and Pentax K500 digital SLR cameras), all digital cameras incorporating a Pentax PRIME II image processor (e.g., Pentax K-3 digital SLR cameras), all printers and other office products incorporating a Ricoh B2297180 processor (e.g., Ricoh Aficio SP4110N printers), and all projectors and other office products incorporating a Marvell 88E1518-NNB2 transceiver (e.g., Ricoh WX4141N projectors) (collectively, “the ’405 Infringing Products”).

34. The Ricoh Defendants’ customers (e.g., distributors, retailers, and online vendors) and Ricoh Americas and/or Ricoh Imaging Americas directly infringe one or more claims of the ’405 patent under 35 U.S.C. § 271(a) by selling, offering to sell, or importing the ’405 Infringing Products in the United States. The Ricoh Defendants have actively induced infringement of, and continue to actively induce infringement of, one or more claims of the ’405 patent under 35 U.S.C. § 271(b), either literally and/or under the doctrine of equivalents, by selling, importing, and/or offering for sale the ’405 Infringing Products to its customers and/or Ricoh Americas and/or Ricoh Imaging Americas with the knowledge of the ’405 patent and its claims, with knowledge that its customers will sell, offer to sell, and/or import into the United States the ’405 Infringing Products, and with knowledge and specific intent to encourage and facilitate those infringing sales of the ’405 Infringing Products through distributing the products to retailers, distributors, and online vendors and creating and disseminating promotional and marketing materials, instructional manuals, product manuals and other technical materials related to the ’405 Infringing Products.

35. The Ricoh Defendants have had knowledge of '405 patent and their infringement of that patent since at least July 13, 2012 through a letter sent by Round Rock and a presentation given by Round Rock concerning that infringement.

36. The Ricoh Defendants have infringed, and continue to infringe, at least claims 1, 2, 3, 6, 7, 8, 9, 10 and/or 12 of the '405 patent.

37. Round Rock has been and continues to be damaged by the Ricoh Defendants' infringement of the '405 patent.

38. The Ricoh Defendants have willfully infringed, and continue to willfully infringe, the '405 patent despite having knowledge of the '405 patent at least through Round Rock's July 13, 2012 letter and presentation concerning their infringement.

39. The Ricoh Defendants' conduct in infringing the '405 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT III

Infringement of U.S. Patent No. 6,358,801

40. Paragraphs 1 through 39 are incorporated by reference as if fully stated herein.

41. The '801 patent is valid and enforceable.

42. The Ricoh Defendants have infringed, and continue to infringe, one or more claims of the '801 patent under 35 U.S.C. § 271(a) and/or 271(g), either literally and/or under the doctrine of equivalents, by making, selling, offering to sell, using, and/or importing into the United States, products made by a process described in those claims, including for example, by making, using, selling, offering for sale, and/or importing into the United all digital cameras, printers, copiers, projectors, and other consumer or office electronics incorporating one or more semiconductor components manufactured using 90nm or later (smaller) fabrication technology,

including but not limited to, all digital cameras incorporating a Pentax PRIME image processor (e.g., Pentax K-01 digital SLR cameras and Pentax K500 digital SLR cameras), all digital cameras incorporating a Pentax PRIME II image processor (e.g., Pentax K-3 digital SLR cameras), all printers and other office products incorporating a Ricoh B2297180 processor (e.g., Ricoh Aficio SP4110N printers), and all projectors and other office products incorporating a Marvell 88E1518-NNB2 transceiver (e.g., Ricoh WX4141N projectors) (collectively, “the ’801 Infringing Products”).

43. The Ricoh Defendants have had knowledge of ’801 patent and their infringement of that patent since at least February 6, 2015 through a letter sent by Round Rock concerning that infringement.

44. Round Rock has been and continues to be damaged by the Ricoh Defendants’ infringement of the ’801 patent.

45. The Ricoh Defendants have infringed, and continue to infringe, at least claims 1 and/or 2 of the ’801 patent.

46. The Ricoh Defendants have willfully infringed, and continue to willfully infringe, the ’801 patent despite having knowledge of the ’801 patent at least through Round Rock’s February 6, 2015 letter concerning their infringement.

47. The Ricoh Defendants’ conduct in infringing the ’801 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT IV

Infringement of U.S. Patent No. 6,455,935

48. Paragraphs 1 through 47 are incorporated by reference as if fully stated herein.

49. The ’935 patent is valid and enforceable.

50. The Ricoh Defendants have infringed, and continue to infringe, one or more claims of the '935 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing into the United States all digital cameras, printers, copiers, projectors, and other consumer or office electronics incorporating one or more semiconductor components manufactured using 90nm or later (smaller) fabrication technology, including but not limited to, all digital cameras incorporating a Pentax PRIME image processor (e.g., Pentax K-01 digital SLR cameras and Pentax K500 digital SLR cameras), all digital cameras incorporating a Pentax PRIME II image processor (e.g., Pentax K-3 digital SLR cameras), all printers and other office products incorporating a Ricoh B2297180 processor (e.g., Ricoh Aficio SP4110N printers), and all projectors and other office products incorporating a Marvell 88E1518-NNB2 transceiver (e.g., Ricoh WX4141N projectors) (collectively, "the '935 Infringing Products").

51. The Ricoh Defendants' customers (e.g., distributors, retailers, and online vendors) and Ricoh Americas and/or Ricoh Imaging Americas directly infringe one or more claims of the '935 patent under 35 U.S.C. § 271(a) by selling, offering to sell, or importing the '935 Infringing Products in the United States. The Ricoh Defendants have actively induced infringement of, and continue to actively induce infringement of, one or more claims of the '935 patent under 35 U.S.C. § 271(b), either literally and/or under the doctrine of equivalents, by selling, importing, and/or offering for sale the '935 Infringing Products to its customers and/or Ricoh Americas and/or Ricoh Imaging Americas with the knowledge of the '935 patent and its claims, with knowledge that its customers will sell, offer to sell, and/or import into the United States the '935

Infringing Products, and with knowledge and specific intent to encourage and facilitate those infringing sales of the '935 Infringing Products through distributing the products to retailers, distributors, and online vendors and creating and disseminating promotional and marketing materials, instructional manuals, product manuals and other technical materials related to the '935 Infringing Products.

52. The Ricoh Defendants have had knowledge of '935 patent and their infringement of that patent since at least July 13, 2012 through a letter sent by Round Rock and a presentation given by Round Rock concerning that infringement.

53. The Ricoh Defendants have infringed, and continue to infringe, at least claims 1, 2, 3, 4, 6, 8, 9, and/or 10 of the '935 patent.

54. Round Rock has been and continues to be damaged by the Ricoh Defendants' infringement of the '935 patent.

55. The Ricoh Defendants have willfully infringed, and continue to willfully infringe, the '935 patent despite having knowledge of the '935 patent at least through Round Rock's July 13, 2012 letter and presentation concerning their infringement.

56. The Ricoh Defendants' conduct in infringing the '935 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

COUNT V

Infringement of U.S. Patent No. 6,828,683

57. Paragraphs 1-56 are incorporated by reference as if fully stated herein.

58. The '683 patent is valid and enforceable.

59. The Ricoh Defendants have infringed, and continue to infringe, one or more claims of the '683 patent under 35 U.S.C. § 271(a), either literally and/or under the doctrine of

equivalents, by making, using, selling, and/or offering for sale in the United States, and/or importing into the United States, products encompassed by those claims, including for example, by making, using, selling, offering for sale, and/or importing into the United States all digital cameras, printers, copiers, projectors, and other consumer or office electronics incorporating one or more semiconductor components manufactured using 90nm or later (smaller) fabrication technology, including but not limited to, all digital cameras incorporating a Pentax PRIME image processor (e.g., Pentax K-01 digital SLR cameras and Pentax K500 digital SLR cameras), all digital cameras incorporating a Pentax PRIME II image processor (e.g., Pentax K-3 digital SLR cameras), all printers and other office products incorporating a Ricoh B2297180 processor (e.g., Ricoh Aficio SP4110N printers), and all projectors and other office products incorporating a Marvell 88E1518-NNB2 transceiver (e.g., Ricoh WX4141N projectors) (collectively, “the ’683 Infringing Products”).

60. The Ricoh Defendants’ customers (e.g., distributors, retailers, and online vendors) and Ricoh Americas and Ricoh Imaging Americas directly infringe one or more claims of the ’683 patent under 35 U.S.C. § 271(a) by selling, offering to sell, or importing the ’683 Infringing Products in the United States. The Ricoh Defendants have actively induced infringement of, and continue to actively induce infringement of, one or more claims of the ’683 patent under 35 U.S.C. § 271(b), either literally and/or under the doctrine of equivalents, by selling, importing, and/or offering for sale the ’683 Infringing Products to its customers and/or Ricoh Americas and/or Ricoh Imaging Americas with the knowledge of the ’683 patent and its claims, with knowledge that its customers will sell, offer to sell, and/or import into the United States the ’683 Infringing Products, and with knowledge and specific intent to encourage and facilitate those infringing sales of the ’683 Infringing Products through distributing the products to retailers,

distributors, and online vendors and creating and disseminating promotional and marketing materials, instructional manuals, product manuals and other technical materials related to the '683 Infringing Products.

61. The Ricoh Defendants have had knowledge of the '683 patent and their infringement of that patent since at least February 6, 2015 through a letter sent by Round Rock concerning that infringement.

62. The Ricoh Defendants have infringed, and continue to infringe, at least claims 27, 28, 30, 32, 33, 34, and/or 35 of the '683 patent.

63. Round Rock has been and continues to be damaged by the Ricoh Defendants' infringement of the '683 patent.

64. The Ricoh Defendants have willfully infringed, and continue to willfully infringe, the '683 patent despite having knowledge of the '683 patent at least through Round Rock's February 6, 2015 letter concerning their infringement.

65. The Ricoh Defendants' conduct in infringing the '683 patent renders this case exceptional within the meaning of 35 U.S.C. § 285.

Prayer For Relief

WHEREFORE, Round Rock prays for judgment as follows:

A. That the Ricoh Defendants have directly and/or indirectly infringed each of the Patents-in-Suit;

B. That the Ricoh Defendants have willfully infringed each of the Patents-in-Suit;

B. That Round Rock be awarded all damages adequate to compensate it for the Ricoh Defendants' infringement of the Patents-in-Suit, such damages to be determined by a jury and, if necessary to adequately compensate Round Rock for the infringement, an accounting, and

that such damages be trebled and awarded to Round Rock with pre-judgment and post-judgment interest;

C. That this case be declared an exceptional case within the meaning of 35 U.S.C. § 285 and that Round Rock be awarded the attorney fees, costs, and expenses that it incurs prosecuting this action; and

D. That Round Rock be awarded such other and further relief as this Court deems just and proper.

Demand For Jury Trial

Plaintiff Round Rock hereby demands a trial by jury on all issues so triable.

Dated: February 13, 2015

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

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