

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

CANON SOLUTIONS AMERICA, INC. and
CANON U.S.A, INC.

Defendants.

Case No.: 15-cv-3954

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Raster Printing Innovations, LLC (“RPI” or “Plaintiff”), by and through its undersigned attorneys, for its complaint against defendants Canon Solutions America, Inc. (“Canon America”) and Canon U.S.A, Inc. (“Canon USA”) (Canon America and Canon USA are referred to herein as “Defendants”), hereby alleges as follows:

NATURE OF LAWSUIT

1. This action involves claims for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code. This Court has exclusive jurisdiction over the subject matter of the Complaint under 28 U.S.C. § 1338(a).

THE PARTIES

2. RPI is a limited liability company organized under the laws of the state of Illinois and having offices at 111 W. Jackson St., Suite 1700, Chicago, Illinois 60604.

3. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,796,411 (“the ‘411 patent”), entitled “High

resolution real time raster image processing system and method,” issued August 18, 1998. A copy of the ‘411 patent is annexed hereto as Exhibit A.

4. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,828,814 (“the ‘814 patent”), entitled “Reduced cost high resolution real time raster image processing system and method,” issued October 27, 1998. A copy of the ‘814 patent is annexed hereto as Exhibit B.

5. RPI owns all right, title and interest in, and has standing to sue for infringement of United States Patent No. 5,949,438 (“the ‘438 patent”), entitled “High resolution real time Raster image processing system and method,” issued September 7, 1999. A copy of the ‘438 patent is annexed hereto as Exhibit C.

6. Defendant Canon America is a New York Corporation with a place of business at 1800 Bruning Drive, Itasca, Illinois 60143. Canon America transacts business and has, at a minimum, offered to provide and/or provided products and/or services in this judicial district and throughout the State of Illinois that infringe claims of the ‘411, ‘814, and ‘438 patents.

7. Defendant Canon USA is a New York Corporation with a place of business at 100 Park Boulevard, Itasca, Illinois 60143. Canon USA transacts business and has, at a minimum, offered to provide and/or provided products and/or services in this judicial district and throughout the State of Illinois that infringe claims of the ‘411, ‘814, and ‘438 patents.

8. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

DEFENDANTS' ACTS OF PATENT INFRINGEMENT

9. Defendants have infringed claims of the '411, '814 and '438 patents through, among other activities, making, using, selling and offering for sale various models of Canon presses and printers in combination with including, but not limited to, Océ VarioPrint 6320 Ultra+, imagePRESS model nos. 1135+, C60, C800, C700, C7011VPS, C6011VPS, C6011S, C7011VP, C6011VP, C6011; Océ VarioStream Model Nos. 7000CX, 7650 Simplex, 7300 Triplex, 7400 Triplex, 7450 Triplex, 7550 Triplex, 7300 Twin, 7400 Twin, 7450 Twin, 7550 Twin, 7650 Twin; VarioStream Model Nos. 8650 Single, 8750 Single, 8650 Twin, 8750 Twin; Océ JetStream Compact Series Model Nos. 1000, 1400, 1900, 1500; Océ JetStream Dual Series Model Nos. 2200 and 3000; Océ ColorStream 3000; and DreamLabo 5000 in combination with the Canon PRISMAsync print controller, the imagePRESS Server A3300, the imagePRESS CRServer A7300, and other third party compatible print servers.

10. Defendants make, use, sell and offer for sale the imagePress C7011VP with the PRISMAsync print controller.

11. The PRISMAsync controller includes a raster image processor ("RIP") and raster image processes ("RIPs") print jobs.

12. The PRISMAsync print controller has been offered for sale with an Intel QuadCore i7 processor.

13. The PRISMAsync print controller has been offered for sale as part of a Dell Optiplex 960 computer.

14. The Dell Optiplex 960 computer has included an Intel processor with a 1333 megahertz front side bus.

15. The PRISMAsync print controller RIPs documents into printable bitmap images.

16. The PRISMAsync print controller is configured to have font data installed/imported on the print controller.

17. The Canon varioPRINT DP line uses Océ ScreenPoint technology to reproduce color halftones and photographs as grayscale images.

18. The PRISMAsync print controller, the imagePRESS Server A3300, and the imagePRESS CR Server A7300 can output data at a rate that enables the Canon imagePRESS 7011 VP/S print 70 8.5 inch by 11 inch sheets per minute at a four color resolution of 1200 pixels by 1200 pixels per inch.

19. The PRISMAsync print controller can output printing data at a rate in excess of 300 million pixels per second.

20. Defendant's infringement has injured and will continue to injure RPI unless and until this Court enters an injunction prohibiting further infringement and, specifically, enjoining further use of products that come within the scope of the '411, '814, and '438 patents.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs ask this Court to enter judgment against the Defendants, and against their subsidiaries, affiliates, agents, servants, employees and all persons in active concert or participation with them, granting the following relief:

A. An award of damages adequate to compensate RPI for the infringement that has occurred, together with prejudgment interest from the date that Defendant's infringement of the RPI patents began;

- B. Increased damages as permitted under 35 U.S.C. § 284;
- C. A finding that this case is exceptional and an award to RPI of its attorneys' fees and costs as provided by 35 U.S.C. § 285;
- D. A permanent injunction prohibiting further infringement, inducement and contributory infringement of the RPI patent; and
- E. Such other and further relief as this Court or a jury may deem proper and just.

JURY DEMAND

RPI demands a trial by jury on all issues presented in this Complaint.

Dated: May 5, 2015

Respectfully submitted,

/s/ Anthony E. Dowell

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