

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

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

XEIKON AMERICA, INC.

Defendant.

Case No.: 15-CV-3998

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 defendant Xeikon America, Inc. (“Xeikon”) (referred to herein as “Defendant”), 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 Xeikon is a Delaware Corporation with a place of business at 1375 East Irving Park Road, Itasca, Illinois 60143. Xeikon 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. Venue is proper in this District under 28 U.S.C. §§ 1391 and 1400(b).

DEFENDANT’S ACTS OF PATENT INFRINGEMENT

8. Defendant has infringed claims of the ‘411, ‘814 and ‘438 patents through, among other activities, making, using, selling and offering for sale various models of Xeikon presses and printers in combination with including, but not limited to, XEIKON CHEETAH, Xeikon 3030, Xeikon 3050, Xeikon 3300, Xeikon 3500, Xeikon 8500, Xeikon 8600, Xeikon 9800 in combination with Xeikon X-800 digital front end, and other third party compatible print servers.

9. The Xeikon X-800 uses a 2x Dual-Core Intel Xeon processor 5260.

10. The Dual-Core Intel Xeon processor 5260 has a 1333 MHz front side bus.

11. The Xeikon X-800 is configured to receive layout and composition rules through variable data printing applications.
12. The Xeikon X-800 is configured to receive Job Definition Format (“JDF”) files.
13. The Xeikon X-800 has font data memory and is configured to allow users to substitute fonts during raster image processing (“RIP”) of files.
14. The Xeikon X-800 receives image data and font data from databases through variable data printing applications.
15. The Xeikon X-800 is configured to generate printable bitmaps based on received data.
16. The Xeikon X-800 utilizes functionality of the Adobe PDF Print Engine (“APPE”).
17. The Defendant advertises that the Xeikon X-800 includes “powerful screening library [that] help to exploit the 1200 dpi imaging to the fullest. The screen ruling can be adjusted for every image element, ensuring superior image quality.”
18. The Xeikon X-800 is configured to provide data for over 300 million pixels to the Xeikon 8600 in a second.
19. The Xeikon 8500 is configured to print 160 pages per minute at 200 grams per square meter.
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,

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