

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

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

DAINIPPON SCREEN GRAPHICS (USA),  
LLC

Defendant.

**Case No.: 15-CV-3991**

**DEMAND FOR JURY TRIAL**

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**COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Raster Printing Innovations, LLC (“RPI” or “Plaintiff”), by and through its undersigned attorneys, for its complaint against defendant Dainippon Screen Graphics (USA), LLC (“Screen”) (Screen is 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 Screen is an Illinois Limited Liability Company with a place of business at 5110 Tollview Drive, Rolling Meadows, Illinois 60008. Screen 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 Screen presses and printers in combination with including, but not limited to, Truepress Model Nos. Jet520ZZ, Jet520EX-Color, Jet520EX-Monochrome, Jet520, Jet L350UV, JetSX, Jet W1632UV, Jet2500UV, Jet W3200UV HS in combination with the SV-110 raster image processor (“RIP”), the EQUIOS system, and other third party compatible print servers.

9. The SV-110 RIP is a high-speed parallel processing controller that incorporates an Adobe RIP.
10. The SV-110 RIP is a standard feature on the Truepress Jet520.
11. In 2013, the Defendants advertised that Sebis Direct, Inc. “will integrate EQUIOS into its Chicago-area Truepress Jet520 this year.”
12. The Equios system is both a RIP and a full workflow server.
13. The Equios system utilizes an Adobe PDF Print Engine core for computations.
14. The Defendants recommend running the Equios system on a computer with an Intel Xeon hexa-core processor and at least 8 GB of memory.
15. The Intel Xeon line of hexa-core processors include buses. For example, the Intel Xeon Processor W3690 has a Quick Path Interconnect bus that runs at 6.4 GT/S.
16. The Equios system include functionality that loads text objects and converts the text objects to outlines.
17. The Equios system includes functionality that loads a group of individual images and applies transparencies based on the group of images.
18. The Equios system utilizes RIP load balancing and caching of reusable objects and images for high-speed variable data printing.
19. For variable data printing, the Equios system computes the shared elements of a print job once and then caches the shared elements.
20. For variable data printing, the Equios system computes the variable elements page by page.
21. For variable data printing, the Equios system merges the shared elements and the variable elements page by page.

22. The Equios system includes screening functionality that is configured to simulate the color tone for newspaper.

23. 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, Plaintiff asks this Court to enter judgment against the Defendant, and against its 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

Anthony E. Dowell

[aedowell@dowellip.com](mailto:aedowell@dowellip.com)

DOWELL IP

333 W. North Ave #341

Chicago, Illinois 60610

Phone: (312) 291-8351

**ATTORNEY FOR PLAINTIFF**