

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

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

HEWLETT-PACKARD COMPANY and
HEWLETT-PACKARD DEVELOPMENT
COMPANY ENTERPRISE, LP

Defendants.

Case No.: 15-CV-3967

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 Hewlett-Packard Company (“HP”) and Hewlett-Packard Development Company Enterprise, LP (“HP Development”) (HP and HP Development 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 HP is a Delaware Corporation with a place of business at 3000 Hanover Street, Palo Alto, California 94304. HP 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 HP Development is a Texas Limited Partnership with a place of business at 11445 Compaq Center Drive West Houston, Texas 77070. HP Development 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 HP presses and printers in combination with including, but not limited to, HP Indigo Digital Press Model Nos. W7250, WS6600p, 30000, 20000, WS6800, WS6600, WS4600, 10000, 7800, 7600; HP Latex Printer Model No. 360; HP Inkjet Web Press Nos. T200, T230, T260, T300, T350, T360, T400 and T410; HP Scitex Industrial Press Nos. FB10000, FB7600, and 15000; HP Designjet Office Printer Nos. T120, T520, T790, T795, T920, T1300, T1500, T2500 and T3500; and HP Designjet Graphics and Production Printer Nos. Z6200, Z6600, Z6800 and T7200 in combination with HP SmartStream Production Pro Print Server, HP SmartStream Onboard Print Server, HP SmartStream Label and Packaging Print Server, HP SmartStream IN100 Print Server, HP SmartStream IN050 Print Server, HP SmartStream Production Elite Print Server, HP Jetdirect Print Server and other third party compatible print servers.

10. For example, Defendants make, use, sell and offer for sale the HP Indigo Digital Press Model No. W7250 with the HP SmartStream Production Pro Print Server.

11. The HP SmartStream Production Pro Print Server is a raster image processor.

12. The HP SmartStream Production Pro Print Server includes a processor.

13. The HP SmartStream Production Pro Print Server includes a processor bus.

14. The HP SmartStream Production Pro Print Server includes font image memory.

15. The HP SmartStream Production Pro Print Server includes a bit image generator.

16. The HP SmartStream Production Pro Print Server includes a data cache.

17. The HP SmartStream Production Pro Print Server can output to multiple, different printers or presses.

18. The HP SmartStream Production Pro Print Server can output data at a rate that enables the HP Indigo Digital Press Model No. W7250 to print 14,440 8.5 inch by 11 inch sheets per hour at a four color resolution of 812 pixels per inch.

19. The HP SmartStream Production Pro Print Server can output printing data at a rate in excess of 300 million pixels per second.

20. The HP Indigo W7250 Digital Press is advertised as being capable of printing 14,440 8.5 inch by 11 inch sheets per hour at a four color resolution of 812 pixels per inch.

21. The HP SmartStream Production Pro Print Server includes a Production Pro RIP System with a Production Pro System Manager and a Production Pro Raster Image Printer (“RIP”) with RIP Groups.

22. The RIP Groups of the Production Pro RIP System partition PDF files into pieces and assign the pieces to RIP engines.

23. The HP SmartStream Production Pro Print Server loads fonts onto RIP engines based on user commands through the Production RIP Manager.

24. The RIP engines of the Production Pro RIP System generate bitmap images from vector data.

25. The bitmap images from the RIP engines of HP SmartStream Production Pro Print Server are sent to Production Pro Press Controllers.

26. The RIP engines of the Production Pro RIP System send bitmap images to both PrintLink presses and non-PrintLink presses via Production Pro Press Controllers.

27. 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

Anthony E. Dowell

aedowell@dowellip.com

DOWELL IP

333 W. North Ave #341

Chicago, Illinois 60610

Phone: (312) 291-8351

ATTORNEY FOR PLAINTIFF