

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

RASTER PRINTING INNOVATIONS, LLC

Plaintiff,

vs.

ELECTRONICS FOR IMAGING, INC.

Defendants.

Case No.: 15-cv-10689

DEMAND FOR JURY TRIAL

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Raster Printing Innovations, LLC (“RPI”), by and through its undersigned attorneys, for its complaint against defendant Electronics for Imaging, Inc. (“EFI”), 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. Plaintiff 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 EFI is a Delaware Corporation with a principal place of business at 6750 Dumbarton Circle, Fremont, California 94555. Defendant EFI operates an office in this judicial district at 150 N. Michigan Ave., Suite 300, Chicago, Illinois 60601, and transacts business and has 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).

EFI’S ACTS OF PATENT INFRINGEMENT

8. EFI has infringed claims of the ‘411 and ‘438 patents through, among other activities, making, using, selling and offering for sale various models of Fiery digital front end servers (both external and embedded) including, but not limited to, Fiery IC-308, IC-310, IC-414, IC-415, IC-416, Color Server Pro, EB-32, E-41/E-81, E-41A, E-42/E-82, E-22B/E-42B, E-43/E-83, E-43A/E-83A, MX-PE10, proServer and XF servers running EFI Fiery software including, but not limited to, Fiery FS200 Pro, FS200, FS150 Pro, FS150, FS100

Pro, FS100, System 10, System 9 (including 9e and Release 2), System 8 (including 8e) and XF server software.

9. EFI has infringed claims of the '814 patent through, among other activities, making, using, selling and offering for sale EFI Jetrion 4000, 4830, 4900, 4900LX, 4900ML and 4950LX inkjet label printers in combination with the Fiery XF digital front end

10. EFI sold and offered for sale one or more of the products listed above with knowledge of the '411, '438 and '814 patents.

11. EFI sold or offered for sale one or more of the products listed above despite an objectively high likelihood that its actions constituted infringement of a valid patent, and such likelihood was known or so obvious that it should have been known by EFI.

12. EFI has willfully infringed claims of the '411, '438 and '814 patents with its sales and offers for sale of one or more of the products listed above.

13. EFI'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, RPI ask this Court to enter judgment against EFI, 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: November 28, 2015

Respectfully submitted,

/s/ Anthony E. Dowell

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