IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

CHARLES C. FREENY III, BRYAN E. FREENY, and JAMES P. FREENY,	**Case No. 2:17-CV-0184**
Plaintiffs,	**JURY TRIAL DEMANDED**
v.	
KONICA MINOLTA BUSINESS SOLUTIONS USA, INC.,	
Defendant.	

COMPLAINT FOR PATENT INFRINGEMENT

Plaintiffs Charles C. Freeny III, Bryan E. Freeny, and James P. Freeny (collectively "Plaintiffs"), for their Complaint against Defendant Konica Minolta Business Solutions, Inc., hereby allege as follows:

THE PARTIES

1. Plaintiff Charles C. Freeny III is an individual residing in Flower Mound, Texas.

2. Plaintiff Bryan E. Freeny is an individual residing in Ft. Worth, Texas.

3. Plaintiff James P. Freeny is an individual residing in Spring, Texas.

4. On information and belief, Defendant Konica Minolta Business Solutions USA, Inc. ("Konica") is a corporation duly organized and existing under the laws of the State of New York, having its principal place of business at 100 Williams Drive, Ramsey, New Jersey 07446.

JURISDICTION AND VENUE

5. This is an action for patent infringement arising under the Patent Act, 35 U.S.C. §§101 et seq. This Court has jurisdiction over Plaintiffs' federal law claims under 28 U.S.C. §§1331 and 1338(a).

6. This Court has specific and/or general personal jurisdiction over Konica because it has committed acts giving rise to this action within this judicial district and/or has established minimum contacts within Texas and within this judicial district such that the exercise of jurisdiction over each would not offend traditional notions of fair play and substantial justice.

7. Venue is proper in this District pursuant to 28 U.S.C. §§1391(b)-(c) and 1400(b) because Konica has committed acts within this judicial district giving rise to this action, and continues to conduct business in this district, and/or has committed acts of patent infringement within this District giving rise to this action.

BACKGROUND OF THE INFRINGING PRODUCTS

8. Konica manufactures and sells multifunction printers, including the bizhub 227, C227, C258, 287, C287, 308, C308, 367, C367, 368, and C368 printers ("the accused Konica products"). The accused Konica products provide a variety of document processing and reproduction functions, such as document copying, printing, scanning, and/or faxing functions.

9. The accused Konica products can communicate wirelessly with different types of wireless devices such as smartphones, tablets, and laptop computers. For example, in its product brochure for the bizhub 227, Konica states:

Wireless LAN (AP mode) support

The MFP becomes a wireless LAN Access Point*6 to allow direct wireless connection between mobile devices and bizhub. Devices brought into the office will be able to directly connect with bizhub and are securely separated from existing company LANs.
PageScope Mobile will enable more convenient use, as wireless set up can be completed between a mobile device and bizhub simply by reading the QR code that is displayed on the machine panel.

*6 Optional Upgrade Kit UK-212 and Device Connection I/F Kit EK-608 or EK-609 are required.

QR code display screen

Wireless LAN (AP mode) connection image

* In AP mode (base unit), simultaneous connections can be made with up to 5 devices.

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_brochure_e.pdf

10. The accused Konica products can transmit and receive data wirelessly using different types of wireless signals. For example, in its "Spec Sheet" for the bizhub 227, Konica states that the printer can communicate wirelessly using IEEE 802.11 b, g, and n communication protocols, which are transmitted in the 2.4 GHz and 5.0 GHz frequency bands:

Printer Specifications

Type		Embedded
CPU		ARM Cortex-A7 Dual-core 1.2GHz
Memory		Shared with the copier
Print Speed		Same as Copy Speed (when using the same original)
HDD		250 GB (Shared with the copier)
Print Resolution		1,800 dpi (equivalent) × 600 dpi
PDL		PCL 6, PostScript 3 Emulation, XPS
Protocol		TCP/IP, IPX/SPX (NDS support), SMB (NetBEUI), LPD, IPP1.1, SNMP, AppleTalk
Support OS		Windows Vista*1 / 7*1 / 8*1 / 8.1*1 / 10*1 Windows Server 2008*1 / 2008 R2 / 2012 / 2012 R2 Mac OS X (10.6 / 10.7 / 10.8 / 10.9 / 10.10 / 10.11) Linux
Fonts	PCL	80 Roman fonts
	PS	137 Roman Type1 fonts
Interface		Ethernet (10BASE-T/100BASE-TX/1000BASE-T), USB 1.1, USB 2.0, IEEE 802.11 b/g/n*2

*1 Supports the 32-bit (x86) or 64-bit (x64) environment.
*2 Optional

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_spec_sheet_e.pdf

11. The accused Konica products include functionality for controlling access to the printer such that only authorized users and/or devices can access functions on the printer. This security feature requires that the device communicating with the printer transmit certain identifying information such as device identification data, user name, and/or password in order to authenticate and authorize the device to access functions on the printer. For example, in its product brochure for the bizhub 227, Konica states:

IC card authentication

To authenticate*2 with various types of IC card*3. The authentication method also compliance with SSFC (Shared Security Formats Cooperation) standard. Besides the IC card, authentication can also be performed with any Android devices*4 that equipped NFC antenna.

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_brochure_e.pdf

12. As another example, in its "User's Guide" for the bizhub 227, Konica states:

User Authentication

Employing User Authentication enables you to manage users who can use this machine. It also enables security- and cost-conscious advanced operations of this machine. By employing User Authentication, you can use the following functions to users of this machine.

Functions	Description
Identification	This function allows you to restrict users of this machine by identifying them.
Allow	You can set privileges to use the functions of this machine by user. • For example, you can configure settings so that to make printing is available for a specific user but not available for other users. Also, you can set it up so that users unidentified by this machine (public users) are not allowed to print data. • You can also limit access to destinations for each user. Based on the degree of importance of the address and relation with users, you can set it up so that specific users can access all destinations but other users can access only a part of destinations. Configuring settings according to the business requirements of users provides you with security measures and cost reductions simultaneously.

Source: http://manuals.konicaminolta.eu/bizhub-367-287-227-UD/EN/contents/id08-_102039613.html

13. In addition to communicating wirelessly with other devices such as smartphones, tablets, and laptop computers, the accused Konica products can also transmit data over a Local Area Network ("LAN") and/ or the Internet via a wired connection such as an Ethernet connection. For example, in its "Spec Sheet" for the bizhub 227, Konica states that the printer can transmit Internet Faxes via an Ethernet connection:

Internet Fax

Protocol	TX: SMTP, RX: POP3, TCP/IP Simple mode
Connection Mode	Full-Mode
Sending Paper Size	A3, B4, A4
Recording Paper Size	Max. A3
Resolution	B/W: 200 × 100 dpi, 200 × 200 dpi, 400 × 400 dpi, 600 × 600 dpi Colour: 200 × 200 dpi, 400 × 400 dpi, 600 × 600 dpi
Interface	Ethernet (10BASE-T/100BASE-TX/1000BASE-T)
Colour	Support Colour Internet Fax
Format	B/W: TIFF-F Colour: TIFF (Conforms to RFC3949 Profile-C)

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_spec_sheet_e.pdf

14. The accused Konica products can also access web pages over the Internet. For example, in its product brochure for the bizhub 227, Konica states:

Standard web browser

The multi-touch UI in the operational panel can be used to display and print out web page contents. It is convenient for print required portions of PDF files that can be viewed on websites, or to print maps for places you are about to visit.

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_brochure_e.pdf

15. The accused Konica products can also send and receive data in the format of email messages. For example, in its "User's Guide" for the bizhub 227, Konica states:

Scan to E-mail Function

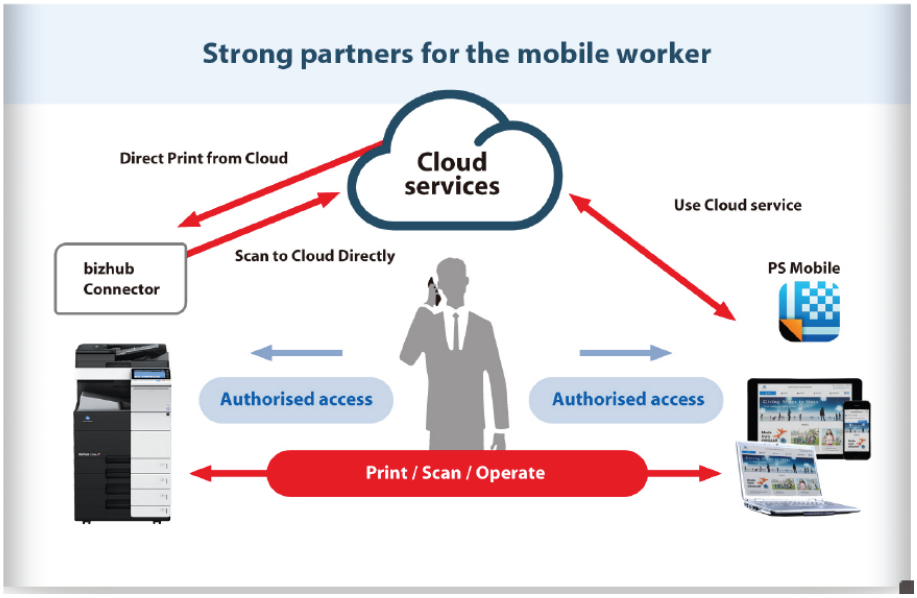
The Scan to E-mail function converts original data scanned by this machine into a file supported by a computer, and sends it to any E-mail address as an E-mail attachment.

Using this function, you can send a file in the same way as when sending an E-mail, enabling easy operation and installation.

It supports S/MIME or SSL/TLS encryption and POP before SMTP authentication, assuring security measures. If the LDAP server or Active Directory of Windows Server is used for user management, an E-mail address can be searched via the server.

Source: http://manuals.konicaminolta.eu/bizhub-367-287-227-UD/EN/contents/id02-_102038805.html

16. The accused Konica products can also connect with, manage, and share resources with other devices within a computer network. For example, as advertised by Konica, the accused Konica products include bizhub Connector technology, which allows the printers to store and retrieve data in other networked locations such as cloud services:



Source: http://www.biz.konicaminolta.com/solutions/psmobile/android.html

17. The accused Konica products can be controlled from an LCD touchscreen on the printer. The touchscreen has a "Home" screen from which the user can select the different basic functions of the printer, such as faxing, copying, and scanning. For example, in its product brochure for the bizhub 227, Konica states:

New 7 inch operation panel

The new 7 inch operation panel provides industry top class multi-touch sensitivity, user friendly interface and intuitive operability. 4 hard menu keys at the bottom of the panel and the on-screen soft menu keys can allow user to register up to 9 commonly used functions such as copy, scan/fax, preview or soft numeric keypad.

Hard registration keys
Register up to 4 commonly used function.

Soft menu keys
Register up to 5 commonly used function.

Soft menu keys will appear by tapping on the screen tab.

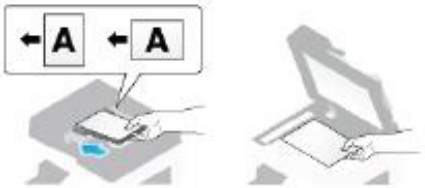
. . .

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_brochure_e.pdf

18. In the accused Konica products, when a user selects a basic function through the touchscreen such as faxing, copying or scanning, the touchscreen then displays a submenu of functions for that basic function. Upon the user's selection of the particular task that the user wishes to be performed by printer within this submenu of functions, the printer will then perform that task using the appropriate combination of hardware and software components necessary to complete the task. For example, in its "User's Guide" for the bizhub 227, Konica shows that there are a number of submenu functions available for the basic function of scanning or sending faxes:

Sending (Basic Operation Flow)

1. **Load the original.**



2. **Tap [Scan/Fax].**

3. **Specify the destination.**
   - For details on how to specify a destination, refer to [Specifying a Destination] .
   - **Specifying multiple destinations carries out computer sending and fax transmission simultaneously.**

   - If necessary, you can change the display of the main screen in fax/scan mode (default: [Address Book]). For details, refer to [Default Tab] .

4. **Configure Scan option settings as necessary.**
   - For details on configuring option settings, refer to the respective columns of the following table.

Source: http://manuals.konicaminolta.eu/bizhub-367-287-227-UD/EN/contents/id02-_102038742.html

19. The accused Konica products include an "Address Book" functionality for storing, organizing, and retrieving contact information for potential recipients of data transmitted from the printer. For example, in its "User's Guide" for the bizhub 227, Konica states:

Selecting from address book

In [Address Book], select the destination registered on this machine.

You can send data by broadcast transmission if you select multiple destinations. You can also use broadcast transmission by combining different sending modes such as Scan to E-mail and SMB Send.

For details on how to register a destination, refer to [Registering Frequently Used Destinations (Address Book)].

Source: http://manuals.konicaminolta.eu/bizhub-367-287-227-UD/EN/contents/id02-_102038751.html#p1039

20. The accused Konica products are designed to be compact, lightweight printers with a small physical footprint so that they take up minimal space within a room or office and can be easily moved to different locations. For example, in its product brochure for the bizhub 227, Konica states:

Lighter and compact MFP body

The newly developed MFP main body offers compact and lightweight body than its predecessor, the bizhub 283/223. The MFP is able to fit almost in any type of working space.

Source: http://www.biz.konicaminolta.com/bw/367_287_227/pdf/bizhub_367_287_227_brochure_e.pdf

COUNT I
(INFRINGEMENT OF U.S. PATENT NO. 6,490,443)

21. Plaintiffs re-allege and incorporate by reference the allegations set forth in the Paragraphs above as if fully set forth herein.

22. On December 3, 2002, the United States Patent and Trademark Office duly and lawfully issued United States Patent Number 6,490,443 ("the '443 patent"), entitled "Communication and Proximity Authorization Systems." A true and correct copy of the '443 patent is attached hereto as **Exhibit A**.

23. The '443 patent describes, among other things, novel systems in which electronic devices can communicate wirelessly to provide and/or receive services from other electronic devices when they are within proximity of each other. These communications can occur over multiple communication signals and with the use of authorization codes.

24. The named inventor of the '443 patent is Charles C. Freeny, Jr., who is now deceased.

25. Plaintiffs are the sons of Charles C. Freeny, Jr., and Plaintiffs are the owners and assignees of all right, title and interest in and to the '443 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

26. Plaintiffs have complied with the requirements of 35 U.S.C. § 287 with respect to the '443 patent.

27. On information and belief, Konica has directly infringed and continues to directly infringe one or more claims of the '443 patent, including at least claim 1 of the '443 patent, in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering for sale, and/or importing into the United States multifunction printers that embody one or more of the inventions claimed in the '443 patent,

including but not limited to the accused Konica products, and all reasonably similar products, in violation of 35 U.S.C. § 271(a).

28. For example, claim 1 of the ’443 patent recites “[a] proximity service unit for providing at least one predetermined service for use with multiple types of wireless devices,” with the unit including “a multiple channel wireless transceiver capable of receiving at least two signal types” and the unit providing a service in response to receiving a “request authorization code” from the wireless devices.

29. The accused Konica products constitute proximity service units that provide at least one predetermined service for use with multiple types of wireless devices. For example, the accused Konica products provide services such as document copying, printing, scanning, and/or faxing services. In addition, the accused Konica products can be used with multiple types of wireless devices such as smartphones, tablets, and laptop computers.

30. The accused Konica products also include a multiple channel wireless transceiver capable of receiving at least two signal types, and provide a service in response to receiving a “request authorization code” from the wireless devices. For example, the accused Konica products can receive multiple wireless signal types such as IEEE 802.11 b, g, and n communications transmitted in the 2.4 GHz and 5.0 GHz frequency bands. In addition, the accused Konica products include a security feature that requires a wireless device seeking to activate services such as printing functionality on the printer to transmit a request authorization code (such as device identification data, user name, and/or password) in order to activate those services.

31. On information and belief, Konica will continue to infringe the ’443 patent unless enjoined by this Court.

32. Konica's acts of infringement have damaged Plaintiffs in an amount to be proven at trial, but in no event less than a reasonable royalty. Konica's infringement of Plaintiffs' rights under the '443 patent will continue to damage Plaintiffs, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

COUNT II
(INFRINGEMENT OF U.S. PATENT NO. 7,110,744)

33. Plaintiffs re-allege and incorporate by reference the allegations set forth in the Paragraphs above as if fully set forth herein.

34. On September 19, 2006, the United States Patent and Trademark Office duly and lawfully issued United States Patent Number 7,110,744 ("the '744 patent") entitled "Communication and Proximity Authorization Systems." A true and correct copy of the '744 patent is attached hereto as **Exhibit B**.

35. The '744 patent describes, among other things, novel systems in which a diverse set of devices can communicate with one another through wireless signals when the devices are within a certain proximity distance to each other. One device within this system can be a "front end unit" that serves as an access point through which multiple end-user devices can be connected simultaneously to a larger network through different types of wireless signals.

36. The named inventor of the '744 patent is Charles C. Freeny, Jr., who is now deceased.

37. Plaintiffs are the sons of Charles C. Freeny, Jr., and Plaintiffs are the owners and assignees of all right, title and interest in and to the '744 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

38. Plaintiffs have complied with the requirements of 35 U.S.C. § 287 with respect to the '744 patent.

39. On information and belief, Konica has directly infringed and continues to directly infringe one or more claims of the ’744 patent, including at least claim 18 of the ’744 patent, in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering for sale, and/or importing into the United States multifunction printers that embody one or more of the inventions claimed in the ’744 patent, including but not limited to the accused Konica products, and all reasonably similar products, in violation of 35 U.S.C. § 271(a).

40. For example, claim 18 of the ’744 patent recites “[a] communication unit connected to a public communication system, the communication unit capable of detecting a plurality of wireless devices and servicing each of the plurality of wireless devices by providing access to the public communication system when the wireless devices are within a predetermined proximity distance from the communication unit,” and where the communication unit includes a “multiple channel wireless transceiver simultaneously communicating with at least two wireless devices with different types of low power communication signals.”

41. The accused Konica products constitute a communication unit connected to a public communication system, the communication unit capable of detecting a plurality of wireless devices and servicing each of the plurality of wireless devices by providing access to the public communication system when the wireless devices are within a predetermined proximity distance from the communication unit. For example, the accused Konica products can detect a plurality of wireless devices such as smartphones, tablets, and laptop computers and communicate with these devices wirelessly when they are within range of the printer’s transceiver as well as transmit data from these devices to the Internet.

42. In addition, the accused Konica products include a multiple channel wireless transceiver that can simultaneously communicate with at least two wireless devices with different types of low power communication signals. For example, the accused Konica products can communicate with wireless devices such as smartphones, tablets, and laptop computers using multiple wireless signal types such as IEEE 802.11 b, g, and n communications transmitted in the 2.4 GHz and 5.0 GHz frequency bands, which are low power communication signals.

43. On information and belief, Konica will continue to infringe the '744 patent unless enjoined by this Court.

44. Konica's acts of infringement have damaged Plaintiffs in an amount to be proven at trial, but in no event less than a reasonable royalty. Konica's infringement of Plaintiffs' rights under the '744 patent will continue to damage Plaintiffs, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

COUNT III
(INFRINGEMENT OF U.S. PATENT NO. 6,806,977)

45. Plaintiffs re-allege and incorporate by reference the allegations set forth in the Paragraphs above as if fully set forth herein.

46. On October 19, 2004, the United States Patent and Trademark Office duly and lawfully issued United States Patent Number 6,806,977 ("the '977 patent"), entitled "Multiple Integrated Machine System." A true and correct copy of the '977 patent is attached hereto as **Exhibit C**.

47. The '977 patent describes, among other things, novel systems in which a single device can perform the functions of multiple different digital machines, such as the functions of a PC, a phone, a fax machine, a printer, a scanner, a copier, a networking device, and/or a personal digital assistant. The device controls all of these functions through the use of a modular design

in which different functions rely on different combinations of hardware and software, with the device including a grouping control unit as well as subgroup function control units to manage the different functions as they are selected by the user.

48. The named inventor of the ’977 patent is Charles C. Freeny, Jr., who is now deceased.

49. Plaintiffs are the sons of Charles C. Freeny, Jr., and Plaintiffs are the owners and assignees of all right, title and interest in and to the ’977 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

50. Plaintiffs have complied with the requirements of 35 U.S.C. § 287 with respect to the ’977 patent.

51. On information and belief, Konica has directly infringed one or more claims of the ’977 patent, including at least claim 1 of the ’977 patent, in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering for sale, and/or importing into the United States multifunction printers that embody one or more of the inventions claimed in the ’977 patent, including but not limited to the accused Konica products, and all reasonably similar products, in violation of 35 U.S.C. § 271(a).

52. For example, claim 1 of the ’977 patent recites “[a] multiple integrated machine system capable of performing as at least two or more digital machines . . . .” Claim 1 also recites that the “first digital machine” is “a small office home office digital machine having at least two of the function modes selected from the group comprising a message center mode, a storage center mode, a document center mode, and an internet center mode,” with at least one of these modes including “an email function.” Claim 1 further recites that the claimed system also has “a digital machine element grouping control unit” for combining different digital machine elements

to form different digital machines as well as at least two "subgroup function control units" for selecting different functions within each digital machine.

53. The accused Konica products constitute multiple integrated machine systems that are capable of performing as at least two or more digital machines, with one of those digital machines being a small office home office digital machine. For example, the accused Konica products are capable of performing as a small office home office digital machine with at least a message center and document center mode by providing document copying, printing, scanning, and faxing capabilities. In addition, the accused Konica products have at least one email function such as the ability to send scanned documents as email attachments.

54. The accused Konica products are also capable of performing as a networking machine by, for example, allowing the printer to connect with, manage, and share resources with other devices within a computer network. The accused Konica products are also capable of performing as a personal digital assistant machine by, for example, storing and organizing contact information for users.

55. The accused Konica products also include "a digital machine element grouping control unit" for combining different digital machine elements to form different digital machines as well as at least two "subgroup function control units" for selecting different functions within each digital machine. For example, the accused Konica products include software that allows the user to switch between using the device as a small office home office machine, a network digital machine, and a personal digital assistant machine by selecting the desired function through the printer's LCD touchscreen. The software in the accused Konica products also provides to the user different submenus of functions for each digital machine upon the user's selection of that digital machine through the LCD touchscreen.

56. Konica's acts of infringement have damaged Plaintiffs in an amount to be proven at trial, but in no event less than a reasonable royalty.

COUNT IV
(INFRINGEMENT OF U.S. PATENT NO. 7,301,664)

57. Plaintiffs re-allege and incorporate by reference the allegations set forth in the Paragraphs above as if fully set forth herein.

58. On November 27, 2007, the United States Patent and Trademark Office duly and lawfully issued United States Patent Number 7,301,664 ("the '664 patent"), entitled "Multiple Integrated Machine System." A true and correct copy of the '664 patent is attached hereto as **Exhibit D**.

59. The '664 patent describes, among other things, novel systems in which a single device can perform the functions of multiple different digital machines, such as the functions of a PC, a phone, a fax machine, a printer, a scanner, a copier, and/or a personal digital assistant. The device controls all of these functions through the use of a modular design in which different functions rely on different combinations of hardware and software, with the device including a grouping control unit as well as subgroup function control units to manage the different functions as they are selected by the user.

60. The named inventor of the '664 patent is Charles C. Freeny, Jr., who is now deceased.

61. Plaintiffs are the sons of Charles C. Freeny, Jr., and Plaintiffs are the owners and assignees of all right, title and interest in and to the '664 patent, including the right to assert all causes of action arising under said patent and the right to any remedies for infringement of it.

62. Plaintiffs have complied with the requirements of 35 U.S.C. § 287 with respect to the '664 patent.

63. On information and belief, Konica has directly infringed one or more claims of the ’664 patent, including at least claim 1 of the ’664 patent, in the State of Texas, in this judicial district, and elsewhere in the United States by, among other things, making, using, selling, offering for sale, and/or importing into the United States multifunction printers that embody one or more of the inventions claimed in the ’664 patent, including but not limited to the accused Konica products, and all reasonably similar products, in violation of 35 U.S.C. § 271(a).

64. For example, claim 1 of the ’664 patent recites “[a] mobile multiple integrated machine system capable of performing as at least a communication machine and a personal digital assistant machine . . . .” Claim 1 also recites that the claimed system also has “a digital machine element grouping control unit” for combining different digital machine elements to form different digital machines as well as at least two “subgroup function control units” for selecting different functions within the communication machine and personal digital assistant machine.

65. The accused Konica products constitute mobile multiple integrated machine systems that are capable of performing as at least two or more digital machines, with one of those digital machines being a communication machine. The accused Konica products are capable of performing as a communication machine by, for example, providing data transmission functions such as faxing documents and sending scanned documents via email.

66. The accused Konica products are also capable of performing as a personal digital assistant machine by, for example, storing and organizing contact information for users.

67. The accused Konica products also include “a digital machine element grouping control unit” for combining different digital machine elements to form different digital machines as well as at least two “subgroup function control units” for selecting different functions within

the communication machine and personal digital assistant machine. For example, the accused Konica products include software that allows the user to switch between using the device as a communication machine and a personal digital assistant machine by selecting the desired function through the printer's LCD touchscreen. The software in the accused Konica products also provides to the user different submenus of functions for the communication machine and the personal digital assistant machine upon the user's selection of that digital machine through the LCD touchscreen.

68. On information and belief, Konica will continue to infringe the '664 patent unless enjoined by this Court.

69. Konica's acts of infringement have damaged Plaintiffs in an amount to be proven at trial, but in no event less than a reasonable royalty. Konica's infringement of Plaintiffs' rights under the '664 patent will continue to damage Plaintiffs, causing irreparable harm for which there is no adequate remedy at law, unless enjoined by this Court.

PRAYER FOR RELIEF

Wherefore, Plaintiffs respectfully request that this Court enter judgment against Konica as follows:

a. For judgment that Konica has infringed and continues to infringe the claims of the '443, '744, '977, and '664 patents;

b. For a permanent injunction against Konica and its respective officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents, and all others acting in active concert therewith from infringement of the '443, '744, '977, and '664 patents;

c. For an accounting of all damages caused by Konica's acts of infringement;

d. For a judgment and order requiring Konica to pay Plaintiffs' damages, costs, expenses, and pre- and post-judgment interest for its infringement of the '443, '744, '977, and '664 patents as provided under 35 U.S.C. § 284;

e. For a judgment and order finding that this is an exceptional case within the meaning of 35 U.S.C. § 285 and awarding to Plaintiffs their reasonable attorneys' fees; and

f. For such other relief at law and in equity as the Court may deem just and proper.

DEMAND FOR A JURY TRIAL

Plaintiffs demand a trial by jury of all issues triable by a jury.

Dated: March 9, 2017

Respectfully submitted,

/s/ Christopher D. Banys
Christopher D. Banys - ***Lead Attorney***

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