UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

RAH COLOR TECHNOLOGIES LLC, Plaintiff, v. DALIM SOFTWARE GMBH Defendant.	Civil Action No. JURY TRIAL DEMANDED

COMPLAINT

This is an action for patent infringement arising under the patent laws of the United States, Title 35 of the United States Code, against Defendant Dalim Software GmbH ("Dalim") that relates to three U.S. patents owned by RAH Color Technologies LLC ("RAH Color Technologies" or "RAHCT"): U.S. Patent Nos. 6,995,870 (the '870 Patent); 7,312,897 (the '897 Patent); and 7,729,008 (the '008 Patent) (collectively, the "Patents-in-Suit").

On December 6, 2018, the United States Judicial Panel on Multidistrict Litigation issued a decision ordering the following other cases involving RAH Color Technologies' patents to be transferred to the Northern District of California and assigned to the Honorable Susan Yvonne Illston for coordinated and/or consolidated pretrial proceedings:

RAH Color Technologies LLC v. Adobe Systems, Inc.,

RAH Color Technologies LLC v. Xerox Corporation, and

Electronics For Imaging, Inc. v. RAH Color Technologies LLC.

The MDL that includes these cases is titled *In Re: RAH Color Technologies LLC Patent Litigation*, N.D. Cal. case no. 18-md-02874. RAH Color Technologies believes this case with

Dalim is a tag-along action that should also be included in the coordinated and consolidated MDL proceedings under the MDL Panel's Rule 7.1.

THE PARTIES

1. Plaintiff RAH Color Technologies is a limited liability company organized under the laws of the Commonwealth of Virginia. RAH Color Technologies maintains an office at 7012 Colgate Drive, Alexandria, Virginia 22307. RAH Color Technologies owns numerous United States patents generally related to the field of color management. Dr. Richard A. Holub manages RAH Color Technologies and is a named inventor of the Patents-in-Suit.

2. Defendant Dalim is a company duly organized and existing under the laws of Germany, with its principal place of business at Strassburger Strasse 6, 77694 Kehl, Germany. On information and belief, Dalim can be served with process at that address.

3. Dalim manufactures, makes, uses, sells, imports, and offers for sale workflow production hardware and software that employ color measurement and management techniques in the U.S.

JURISDICTION AND VENUE

4. This Complaint states causes of action for patent infringement arising under the patent laws of the United States, 35 U.S.C. § 100 *et seq.,* and, more particularly 35 U.S.C. § 271.

5. This Court has subject matter jurisdiction of this action under 28 U.S.C. §§ 1331 and 1338(a) in which the district courts have original and exclusive jurisdiction of any civil action for patent infringement.

6. Dalim is subject to this Court's general personal jurisdiction pursuant to due process and/or the Illinois Long Arm Statute, Illinois Statutes 735 § 5/2-209, due at least to its substantial business conducted in this District, including: (i) having transacted business within

the State of Illinois and attempted to derive financial benefit from residents of the State of Illinois in this District, including benefits directly related to the instant patent infringement causes of action set forth herein; (ii) having placed its products and services into the stream of commerce throughout the United States and having been actively engaged in transacting business in Illinois and in this District, and (iii) having committed the complained of tortious acts in Illinois and in this District. Alternatively, this Court has personal jurisdiction over Dalim pursuant to Federal Rule of Civil Procedure 4(k)(2) based on Dalim's contacts with the United States as a whole.

7. Dalim, directly and/or through subsidiaries and agents (including distributors, retailers, and others), makes, imports, ships, distributes, offers for sale, sells, uses, and advertises (including offering products and services through its websites, for example, https://www.dalim.com/en/homepage/, as well as other retailers) its products and/or services in the United States, the State of Illinois, and the Northern District of Illinois.

8. Dalim, directly and/or through its subsidiaries and agents (including distributors, retailers, and others), has purposefully and voluntarily placed one or more of its infringing products and/or services, as described below, into the stream of commerce with the expectation that they will be purchased and used by consumers in the Northern District of Illinois in an infringing manner. These infringing products and/or services have been and continue to be purchased and used by consumers in the Northern District of Illinois. Dalim has committed acts of patent infringement within the State of Illinois and, more particularly, within the Northern District of Illinois.

9. This Court's exercise of personal jurisdiction over Dalim is consistent with Illinois Long Arm Statute, Illinois Statutes 735 § 5/2-209, and traditional notions of fair play and substantial justice.

10. Venue is proper in this District under 28 U.S.C. §1400(b), which provides that "Any civil action for patent infringement may be brought in the judicial district where the defendant resides, or where the defendant has committed acts of infringement and has a regular and established place of business." Venue is proper as to Defendant Dalim, which is organized under the laws of Germany, under 28 U.S.C. §1391(c)(3) that provides that "a defendant not resident in the United States may be sued in any judicial district, and the joinder of such a defendant shall be disregarded in determining where the action may be brought with respect to other defendants."

BACKGROUND FACTS REGARDING RAH COLOR TECHNOLOGIES

11. RAH Color Technologies is owned by Dr. Richard A. Holub, who is a named inventor of all its patent assets. Dr. Holub holds a Ph.D. in Neurophysiology and has studied and worked extensively in the fields of vision and color reproduction for nearly fifty years.

12. For example, between 1983 and 1994, Dr. Holub worked for several leading companies including Eastman Kodak (following its acquisition of Eikonix Corp., which Dr. Holub joined in 1983), Agfa/Bayer and SuperMac Technologies where he served as Chief Color Scientist, Technology Consultant, and Principal Engineer, respectively, and had responsibility for developing and/or managing development of color technologies for new products.

13. Dr. Holub has additionally been a leader in development, research, and education in the graphic arts industry.

14. For example, for ten consecutive years beginning in 1993-94, Dr. Holub was elected to and served on the Board of Directors of The Technical Association of the Graphic Arts ("TAGA"), now a part of the Printing Industries of America. For nine of those ten years, Dr. Holub was an officer, serving three years as Technical Vice President and Papers Chair, two years as Executive Vice President, two years as President and two years as Immediate Past President. During his three years as Technical VP, Dr. Holub organized four technical conferences, including TAGA's first-ever international conference, and, in addition, TAGA's contributions to the Graphic Arts Show Company's "Conceppts" Conference in two successive years.

15. Between 1995 and 1998, Dr. Holub taught in various instructional programs at Rochester Institute of Technology, especially taking responsibility for research methods courses offered to Master's students pursuing the technology concentration in the School of Printing Management and Sciences (subsequently renamed the School of Print Media). During that time he served on thesis committees for a number of students in the Master's program. Many graduates of that program hold significant positions in the publishing and printing industries. In addition, during the early 1990's, Dr. Holub served as a key technical contributor to early standards developed by CGATS, the Committee for Graphic Arts Technical Standards.

16. Spanning almost two decades, Dr. Holub's R&D work (alone and with collaborators) resulted in 11 papers presented to TAGA's Annual Technical Conference, all of which subsequently appeared in published Conference *Proceedings*. His research also resulted in the contribution of at least four (4) important papers to refereed journals, including the *Journal of Imaging Technology* and *Color Research and Application*, as well as contributions to symposia organized by The Society for Imaging Science and Technology (IS&T), the Society of

Photo-Optical Instrumentation Engineers (SPIE), and the Institute of Electrical and Electronics Engineers (IEEE).

17. In 1994, Dr. Holub began work on a new business that would leverage inventive developments in color measurement, imaging system architecture, user-interface and color reproduction technologies to implement open and accurate color reproduction in a networked environment. Over the next several years, Dr. Holub rented laboratory/demo space from RIT Research Corp., hired students from the Rochester Institute of Technology as well as software and hardware contractors to assist him in developing a first product prototype. The prototype combined instrumentation for fully automatic display calibration with software support for highly accurate soft-proofing. During this time, he also prepared and filed the first two in a series of significant patent disclosures to cover implementations of inventive concepts.

18. Dr. Holub formed Imagicolor Corporation in 1998 to commercialize his prototype described above in paragraph 17. Further efforts at business development continued, however, investment did not materialize and Imagicolor was eventually dissolved.

19. Though commercialization of the prototype did not come to fruition, Dr. Holub continued to innovate, and pursue patents on those innovations, with the United States Patent Office. In 2005, RAH Color Technologies LLC was formed as a vehicle for an on-going licensing program for companies whose products depend on Dr. Holub's innovations.

BACKGROUND FACTS REGARDING THE RAH COLOR TECHNOLOGIES PATENT PORTFOLIO

20. The United States Patent Office has awarded Dr. Holub 35 patents to date, including the following Patents-in-Suit:

- United States Patent No. 6,995,870, entitled "System for Distributing and Controlling Color Reproduction at Multiple Sites" (the '870 Patent);

- United States Patent No. 7,312,897, entitled "System for Distributing and Controlling Color Reproduction at Multiple Sites" (the '897 Patent); and
- United States Patent No. 7,729,008, entitled "System for Distributing and Controlling Color Reproduction at Multiple Sites" (the '008 Patent).

21. The United States Patent Office has considered over 500 references during the prosecution of Dr. Holub's patent applications.

22. Hundreds of subsequently filed patent applications by third parties have cited to Dr. Holub's patents.

23. RAH Color Technologies has licensed the technology covered by its patents to 12 of the largest manufacturers of color imaging and printing products for consumer and professional segments in the world. RAH Color Technologies has also licensed its innovations to two additional manufacturers with extensive experience in the color measurement and management space. Additionally, 13 major companies have entered into end-user license agreements with RAH Color Technologies.

24. These industry-leading companies have each recognized the contributions Dr. Holub has made to the fields of color management, remote proofing, and measurement and control of color product quality.

25. All right, title, and interest in the Patents-in-Suit are held by RAH Color Technologies.

DALIM'S AWARENESS OF THE PATENTS-IN-SUIT

26. Dalim has been aware of the Patents-in-Suit since at least February 18, 2016 when counsel for RAH Color Technologies sent a letter to Dr. Carol Werle, the CEO of Dalim. The letter identified that Patents-in-Suit, as well as the Dalim products that infringed the Patents-in-Suit.

27. Dalim did not respond to the February 18, 2016 letter.

28. On March 18, 2016, April 7, 2016, May 3, 2016, and June 10, 2016, counsel for RAH Color Technologies sent email messages to Dalim seeking to open dialogue on licensing the Patents-in-Suit.

29. Dalim did not respond to any of the messages.

30. Despite knowledge of the Patents-in-Suit, Dalim has continued to infringe and induce the infringement of the Patents-in-Suit.

31. Dalim promotes its capabilities of flexible production workflow, color management, prepress, and soft-proofing software that it sells and offers for sale to customers in the U.S.

32. Dalim has in the past and continues to directly infringe the asserted claims of the Patents-in-Suit pursuant to 35 U.S.C. § 271 by using methods and using, making and importing systems, software, and apparatuses covered by the asserted patent claims identified below.

COUNT I: INFRINGEMENT OF U.S. PATENT '870 CLAIM 34

33. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1 to 32 of this Complaint as though set forth in full herein.

34. Claim 34 of the '870 Patent provides:

Claim 34 Preamble	A method for providing control to a user for processing color images comprising the steps of:
Element A	providing an interface operable at a computer through which the user is able to select a plurality of sites having one or more color input or output devices;
Element B	communicating between said sites through a network interfaces at said sites; and
Element C	providing information for transforming input color image data into output color image data for the color input or output devices at said plurality of sites such that colors produced by the color devices appear substantially the same within colors

	attainable by each of the devices, wherein said information for transforming comprises information relating the color gamuts of different ones of said color devices to each other and user preferences for color reproduction for at least one of the color devices.

35. "Dalim Accused Products" include Dalim Twist used in combination with Dalim ES; and other hardware and software that include the same or equivalent functionality described in paragraphs 36-41 of Count I, paragraph 49 of Count II, paragraph 57 of Count III, paragraph 65 of Count IV, paragraphs 73-78 of Count V, paragraph 86 of Count VI, and paragraph 94 of Count VII.

36. Dalim Accused Products provide control for processing color images through the use of color profiles processed through a color management module ("CMM") as well as through other color management and print production controls.

37. Dalim Accused Products include workflow elements (or modules) that define how production files will be processed, including elements defining output devices such as printers and proofers. These output devices are selected by users when a workflow is set up. In operation, production jobs will be sent to the selected output devices over a network. In addition, Twist integrates with ES, allowing Twist to include workflow steps that involve features provided by ES, including collaboration, soft-proofing, and color approvals. Upon information and belief, sites running ES can be selected for inclusion in a workflow.

38. Dalim Accused Products store and use profiles compliant with the International Color Consortium ("ICC") specifications. These ICC profiles include various data structures (e.g., matrix coefficients, AToB, and BToA-type structures) that define color transformations from an input device to an output device. Processing with ICC profiles is accomplished using a color management module ("CMM"), selectable through at least Twist's user interface. The

CMM provides additional information used during processing of ICC profiles. For example, when using Twist for converting RGB files to CMYK files (using ICC profiles), Twist provides preferences for color reproduction that are included as part of the converted file, such as the use of black point compensation.

39. In Dalim Accused Products, ES includes a monitor calibration feature for soft-proofing. Such monitor calibration is crucial for color accuracy, and ensures that the colors (as viewed on the monitor) are substantially the same when rendered by the rendering device being simulated.

40. Dalim Accused Products support the ICC v.4 specification's implementation of the Perceptual Reference Medium Gamut ("PRMG"), and as such, support processing that relies on the PRMG (or similarly structured gamut data, for example, a gamut descriptor).

41. The PRMG is a reference gamut in coordinates of the ICC-defined Profile Connection Space ("PCS") used for transforming colors between devices having different gamuts. A workflow using the PRMG employs the stored PRMG, or a similarly structured description of device gamuts (e.g., gamut boundary descriptors), to map colors from an input device to an output device using one or more intermediate color-to-color' transformations (i.e., input device gamut in PCS values to PRMG). The relationships between gamuts are expressed in the gamut operators (of the CMM) and the color-to-color' transform(s) that embody a mapping from an input to an output gamut.

42. Dalim infringes claim 34 of the '870 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

43. In addition, Dalim induces infringement of claim 34 of the ’870 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

44. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 34 of the ’870 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 34 of the ’870 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 34 of the ’870 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 34 of the ’870 Patent by using the Dalim Accused Products.

45. Dalim has had knowledge of the ’870 Patent since at least February 18, 2016.

46. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT II: INFRINGEMENT OF U.S. PATENT ’870 CLAIM 39

47. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-46 of this Complaint as though set forth in full herein.

48. Claim 39 of the ’870 Patent provides:

Claim 39	The method according to claim 34 wherein said user preferences for color reproduction include at least one aspect of the utilization of one or more neutral colorants.

49. In Dalim Accused Products, Twist's user interface allows for user selection of stored ICC profiles (e.g., through RGB to CMYK conversion tools). Upon information and belief, at least some of these ICC profiles will have incorporated settings for black ink use (a feature of many ICC profile creation programs), such as GCR. GCR specifies the amount of black ink versus cyan, magenta, and yellow ink to use for generating a color's gray component. As such, users can select GCR preferences based on the selection of ICC profiles.

50. Dalim infringes claim 39 of the '870 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

51. In addition, Dalim induces infringement of claim 39 of the '870 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

52. Upon information and belief, Dalim's customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 39 of the '870 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 39 of the '870 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 39 of the '870 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim's inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 39 of the '870 Patent by using the Dalim Accused Products.

53. Dalim has had knowledge of the ’870 Patent since at least February 18, 2016.

54. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT III: INFRINGEMENT OF U.S. PATENT ’870 CLAIM 41

55. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-46 of this Complaint as though set forth in full herein.

56. Claim 41 of the ’870 Patent provides:

Claim 41	The method according to claim 34 further comprising the step of annotating images produced by at least one of said color devices.

57. In Dalim Accused Products, at least ES includes a feature that allows users to add annotations to images viewed on a computer monitor.

58. Dalim infringes claim 41 of the ’870 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

59. In addition, Dalim induces infringement of claim 41 of the ’870 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

60. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 41 of the ’870 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 41 of the ’870 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 41 of

the ’870 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 41 of the ’870 Patent by using the Dalim Accused Products.

61. Dalim has had knowledge of the ’870 Patent since at least February 18, 2016.

62. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT IV: INFRINGEMENT OF U.S. PATENT ’870 CLAIM 42

63. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-46 of this Complaint as though set forth in full herein.

64. Claim 42 of the ’870 Patent provides:

Claim 42	The method according to claim 34 wherein at least two of said sites capable of being remote from each other.

65. In Dalim Accused Products, when ES is used in a Twist workflow, the monitor(s) used for soft-proofing and color approvals can be remotely located from the rendering device, with colors viewed on the monitor matching that of the device whose color reproduction is being proofed.

66. Dalim infringes claim 42 of the ’870 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing

and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

67. In addition, Dalim induces infringement of claim 42 of the ’870 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

68. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 42 of the ’870 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 42 of the ’870 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 42 of the ’870 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 42 of the ’870 Patent by using the Dalim Accused Products.

69. Dalim has had knowledge of the ’870 Patent since at least February 18, 2016.

70. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT V: INFRINGEMENT OF U.S. PATENT ’897 CLAIM 32

71. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 and 35 of this Complaint as though set forth in full herein.

72. Claim 32 of the ’897 Patent provides:

Claim 32 Preamble	A method for providing control to a user for processing color images comprising the steps of:
Element A	providing an interface through which said user is able to select one or more sites, each having one or more color input or output devices, wherein at least one of said sites is capable of being remotely located with respect to said user;
Element B	providing information regarding identity or location of said one or more sites useable for communication with said sites; and
Element C	providing information for transforming input color image data into output color image data for the color input or output devices at said sites comprising at least information representing the gamuts or a relationship between the gamuts of said color devices, wherein said information for transforming comprises at least user preferences for color reproduction by at least one of the color devices.

73. Dalim Accused Products provide control for processing color images through the use of color profiles processed through its CMM as well as through other color management and print production controls.

74. Dalim Accused Products include workflow elements (or modules) that define how production files will be processed, including elements defining output devices such as printers and proofers. These output devices are selected by users when a workflow is set up. In operation, production jobs will be sent to the selected output devices over a network. In addition, Twist integrates with ES, allowing Twist to include workflow steps that involve features provided by ES, including collaboration, soft-proofing, and color approvals. Upon information and belief, sites running ES can be selected for inclusion in a workflow based on IP address.

75. In Dalim Accused Products, when ES is used in a Twist workflow, the monitor used for soft-proofing and approvals can be remotely located from a rendering device, with colors viewed on the monitor matching that of the device whose color reproduction is being proofed.

76. Dalim Accused Products store and use profiles compliant with the International Color Consortium ("ICC") specifications. These ICC profiles include various data structures (e.g., matrix coefficients, AToB, and BToA-type structures) that define color transformations from an input device to an output device. Processing with ICC profiles is accomplished using a color management module ("CMM"), selectable through at least Twist's user interface. The CMM provides additional information used during processing of ICC profiles. For example, when using Twist for converting RGB files to CMYK files (using ICC profiles), Twist provides preferences for color reproduction that are included as part of the converted file, such as the use of black point compensation.

77. Dalim Accused Products support the ICC v.4 specification's implementation of the Perceptual Reference Medium Gamut ("PRMG"), and as such, support processing that relies on the PRMG (or similarly structured gamut data, for example, gamut descriptors).

78. The PRMG is a reference gamut in coordinates of the ICC-defined Profile Connection Space ("PCS") used for transforming colors between devices having different gamuts. A workflow using the PRMG employs the stored PRMG, or a similarly structured description of device gamuts (e.g., gamut boundary descriptors), to map colors from an input device to an output device using one or more intermediate color-to-color' transformations (i.e., input device gamut in PCS values to PRMG). The relationships between gamuts are expressed in the gamut operators (of the CMM) and the color-to-color' transform(s) that embody a mapping from an input to an output gamut.

79. Dalim infringes claim 32 of the '897 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing

and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

80. In addition, Dalim induces infringement of claim 32 of the ’897 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

81. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 32 of the ’897 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 32 of the ’897 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 32 of the ’897 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 32 of the ’897 Patent by using the Dalim Accused Products.

82. Dalim has had knowledge of the ’897 Patent since at least February 18, 2016.

83. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT VI: INFRINGEMENT OF U.S. PATENT ’897 CLAIM 33

84. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32, 35, and 71-83 of this Complaint as though set forth in full herein.

85. Claim 33 of the ’897 Patent provides:

Claim 33	The method according to claim 32 wherein said user preferences include at least one aspect of the utilization of one or more neutral colorants.

86. In Dalim Accused Products, Twist's user interface allows for user selection of stored ICC profiles (e.g., through RGB to CMYK conversion tools). Upon information and belief, at least some of these ICC profiles will have incorporated settings for black ink use (a feature of many ICC profile creation programs), such as GCR. GCR specifies the amount of black ink versus cyan, magenta, and yellow ink to use for generating a color's gray component. As such, users can select GCR preferences based on the selection of ICC profiles.

87. Dalim infringes claim 33 of the '897 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

88. In addition, Dalim induces infringement of claim 33 of the '897 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

89. Upon information and belief, Dalim's customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 33 of the '897 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 33 of the '897 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 33 of the '897 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim's inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance

contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 33 of the '897 Patent by using the Dalim Accused Products.

90. Dalim has had knowledge of the '897 Patent since at least February 18, 2016.

91. As a direct and proximate result of Dalim's acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT VII: INFRINGEMENT OF U.S. PATENT '897 CLAIM 37

92. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32, 35, and 71-83 of this Complaint as though set forth in full herein.

93. Claim 37 of the '897 Patent provides:

Claim 37	The method according to claim 32 wherein said user preferences are capable of being expressed at least in part by annotations to the image data, said annotations being displayable with but separable from said image data and shareable between two or more said sites.

94. In Dalim Accused Products, at least ES includes a feature that allows users to add annotations to images viewed on a computer monitor. These annotations are stored separately as an XML file, and do not alter the underlying image. As a result, the annotations can be separated from the image.

95. In Dalim Accused Products, ES includes a collaboration feature that allows for multiple users to review jobs at the same time from different locations. When in a collaboration session, users can add annotations that are then shared with the other users in the session.

96. Dalim infringes claim 37 of the '897 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Products, including its use in relation to product testing

and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

97. In addition, Dalim induces infringement of claim 37 of the ’897 Patent by importing and selling the Dalim Accused Products for use by its customers and/or end-users.

98. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 37 of the ’897 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 37 of the ’897 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 37 of the ’897 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 37 of the ’897 Patent by using the Dalim Accused Products.

99. Dalim has had knowledge of the ’897 Patent since at least February 18, 2016.

100. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT VIII: INFRINGEMENT OF U.S. PATENT ’008 CLAIM 28

101. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 of this Complaint as though set forth in full herein.

102. Claim 28 of the ’008 Patent provides:

Claim 28 Preamble	A method for color rendering using a computer system having a display coupled to said computer system, said method comprising the steps of:
Element A	displaying on the display a menu of selections which enable a user to select at least user preferences for color reproduction; and
Element B	storing in memory at least tonal transfer curves for a plurality of color channels, color image data, and one or more color transformations for converting a first set of color coordinates into a second set of coordinates wherein said tonal transfer curves and said one or more color transformations are at least partly in accordance with calibration data in device-independent units of color and are useable in combination to control rendering of said color image data, and at least one of said one or more color transformations is a chromatic adaptation transform useable to compensate for change in viewing conditions.

103. "Dalim Accused Workflow Products" include Dalim Twist and ES, each used individually, and/or in combination with each other; and other hardware and software that include the same or equivalent functionality described in paragraphs 104-110 of Count VIII, paragraph 118 of Count IX, paragraphs 126-127 of Count X, paragraphs 135-136 of Count XI, paragraphs 144 of Count XII, and paragraph 152 of Count XIII.

104. Dalim Accused Workflow Products are used to control color rendering on a computer system. For example, Twist is used for conversions of RGB color images and files to CMYK color images and files using ICC profiles. In such conversions, Twist displays a graphical user interface that includes preferences, such as the type of ICC profiles to use, the CMM to use, and whether to employ black point compensation. For example, ES is used for reviewing and approving soft-proofs of color images. In such soft-proofing, ES displays a graphical user interface that includes preferences, such as the type of ICC profiles to use, paper simulation, and black ink simulation.

105. Dalim Accused Workflow Products store in memory ICC profiles used, for example, during Twist's RGB to CMYK conversion, and ES's soft-proofing. Additionally, ES creates monitor ICC profiles through its monitor calibration feature.

106. The ICC profiles stored by Dalim Accused Workflow Products include certain tagged elements, such as TRC-type tags used in monitor profiles and RGB input device profiles. TRC-type tags define tone reproduction curves, a type of tonal transfer curve. Monitor and RGB input device profiles also include specifications for matrices (e.g., MatrixColumnTags) used for transforming device-independent color values to device-dependent color values and vice versa. Other ICC profiles (such as those used for CMYK output devices) include BToA-type tags, which contain one dimensional curves corresponding to tonal transfer curves, as well as a matrix or a multidimensional lookup table, both used for transforming device-independent color values to device-dependent color values.

107. The ICC profiles stored by Dalim Accused Workflow Products also include a chromatic adaptation transform data structure (indicated by the "chad" tag of ICC profiles), which transforms color values measured under one type of illumination (e.g., D50) to color values for different illumination and viewing conditions (e.g., D65). For example, Twist is used for conversions from RGB to CMYK. RGB images from image capture devices (scanners and digital cameras) commonly have a white point at D65. Both sRGB and Adobe RGB, the most common coordinate systems for representing colors digitally are white balanced to D65 by definition. Calibrated displays are commonly balanced to D65. In contrast, colors converted to CMYK coordinates for printing are prepared for Graphic Arts standard viewing conditions which are based on D50 illumination. As such, Dalim makes use of the chromatic adaptation transform

in ICC profiles at various points in dataflows involving printing and proofing intended to be predictive of the printed color reproduction.

108. The ICC profiles (including tagged data elements) stored by Dalim Accused Workflow Products are created using calibrated rendering devices. For example, ES includes a monitor calibration feature that ensures the monitor is in a calibrated state, and then creates a profile based on measurements of colors as rendered by the calibrated monitor. Profiles stored by Twist are created in a similar manner, but using a printer or proofer as a rendering device. The device used for color measurements and calibration uses device independent color units, such as L*a*b* or density, resulting in device-independent calibration data.

109. The ICC profiles stored by Dalim Accused Workflow Products use color transformations and tonal transfer curves in combination when generating color values useable by an output or rendering device. For example, a profile's red, green, and blueMatrixColumnTag data are used to populate a matrix transform, which is used with the TRC-type data when transforming color values. Similarly, the one dimensional curves and matrix and/or multidimensional lookup table of the BToA-type element are used in combination when transforming color values.

110. In addition, with respect to the chromatic adaptation transform, in one direction, the XYZ values from a source device that are used in the chromatic adaptation transform are derived from the calibrated source device. Similarly, in the opposite direction (rendering on a destination device), XYZ values used in the chromatic adaptation transform will produce the correct colors when rendered on the calibrated destination device.

111. Dalim infringes claim 28 of the '008 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Workflow Products, including its use in relation to product

testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

112. In addition, Dalim induces infringement of claim 28 of the ’008 Patent by importing and selling the Dalim Accused Workflow Products for use by its customers and/or end-users.

113. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 28 of the ’008 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 28 of the ’008 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 28 of the ’008 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 28 of the ’008 Patent by using the Dalim Accused Workflow Products.

114. Dalim has had knowledge of the ’008 Patent since at least February 18, 2016.

115. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT IX: INFRINGEMENT OF U.S. PATENT ’008 CLAIM 29

116. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 and 101-115 of this Complaint as though set forth in full herein.

117. Claim 29 of the ’008 Patent provides:

Claim 29	The method according to claim 28 further comprising the step of enabling the user to display a reproduction of said color image data on the display, and to associate annotations with said reproduction.

118. In Dalim Accused Workflow Products, at least ES includes a feature that allows users to add annotations to color images that are viewed (e.g., during soft-proofing).

119. Dalim infringes claim 29 of the ’008 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Workflow Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

120. In addition, Dalim induces infringement of claim 29 of the ’008 Patent by importing and selling the Dalim Accused Workflow Products for use by its customers and/or end-users.

121. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 29 of the ’008 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 29 of the ’008 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 29 of the ’008 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software

and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 29 of the '008 Patent by using the Dalim Accused Workflow Products.

122. Dalim has had knowledge of the '008 Patent since at least February 18, 2016.

123. As a direct and proximate result of Dalim's acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT X: INFRINGEMENT OF U.S. PATENT '008 CLAIM 30

124. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 and 101-115 of this Complaint as though set forth in full herein.

125. Claim 30 of the '008 Patent provides:

Claim 30	The method according to claim 28 wherein said storing step further comprises storing in the memory gamut data of at least the color output device or another color device in device independent units of color for use in combination with said tonal transfer curves and said one or more color transformations to control rendering of said color image data for improved color matching between said color output device and said another color device.

126. Dalim Accused Workflow Products support and use version 4 ICC profiles, which means they can store, use and process the ICC-defined Perceptual Reference Medium Gamut ("PRMG"), or similarly structured gamut data. Additionally, the CMMs employed by ES and Twist include data and data structures for processing PRMG or similarly structured data (e.g., GBD tags as defined in the ICCMax specification).

127. A workflow using the PRMG, or similarly structured data, employs the PRMG (or similarly structured data) to map colors from an input device to an output device using an intermediate color-to-color' transformation (i.e., input device gamut to PRMG). Both the gamut operator (used to map between gamut descriptors) and the color-to-color' transformations provide information relating the color gamuts of different color devices to each other.

128. Dalim infringes claim 30 of the '008 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Workflow Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

129. In addition, Dalim induces infringement of claim 30 of the '008 Patent by importing and selling the Dalim Accused Workflow Products for use by its customers and/or end-users.

130. Upon information and belief, Dalim's customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 30 of the '008 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 30 of the '008 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 30 of the '008 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim's inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to

directly infringe at least claim 30 of the '008 Patent by using the Dalim Accused Workflow Products.

131. Dalim has had knowledge of the '008 Patent since at least February 18, 2016.

132. As a direct and proximate result of Dalim's acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT XI: INFRINGEMENT OF U.S. PATENT '008 CLAIM 31

133. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 and 101-115 of this Complaint as though set forth in full herein.

134. Claim 31 of the '008 Patent provides:

Claim 31 Preamble	The method according to claim 28 further comprising the steps of
Element C	enabling display of parts of said color image data which are outside the gamut of the color output device and
Element D	storing a data structure in said memory whose inputs are color values and whose outputs indicate whether input values are either in or out of gamut for the color output device.

135. In Dalim Accused Workflow Products, ES includes a Gamut Warning feature that displays portions of a color image that are outside the gamut of a rendering device (e.g., monitor or simulated rendering device).

136. Additionally, the ICC profiles stored by Dalim Accused Workflow Products include the "gamutTag" data structure. This structure is used to indicate if an input color value is in or out-of-gamut for a particular rendering device. Because this structure indicates if an input color is in or out of gamut, it can be used to display if any colors in a color image are outside the gamut of the rendering device.

137. Dalim infringes claim 31 of the ’008 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Workflow Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

138. In addition, Dalim induces infringement of claim 31 of the ’008 Patent by importing and selling the Dalim Accused Workflow Products for use by its customers and/or end-users.

139. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 31 of the ’008 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 31 of the ’008 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 31 of the ’008 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 31 of the ’008 Patent by using the Dalim Accused Workflow Products.

140. Dalim has had knowledge of the ’008 Patent since at least February 18, 2016.

141. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT XII: INFRINGEMENT OF U.S. PATENT '008 CLAIM 36

142. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 and 101-123 of this Complaint as though set forth in full herein.

143. Claim 36 of the '008 Patent provides:

Claim 36	The method according to claim 29 further comprising the step of enabling communication with one or more other computer systems through a network interface of said computer system, in which said annotations are communicated to one or more users at one or more other computer systems.

144. In Dalim Accused Workflow Products, at least ES includes a feature that allows users to add annotations to color images that are viewed (e.g., during soft-proofing). These annotations can be shared with other users through ES's collaboration feature, which allows for multiple users to review images from different locations at the same time.

145. Dalim infringes claim 36 of the '008 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Workflow Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

146. In addition, Dalim induces infringement of claim 36 of the '008 Patent by importing and selling the Dalim Accused Workflow Products for use by its customers and/or end-users.

147. Upon information and belief, Dalim's customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 36 of the '008 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 36 of the '008 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 36 of

the ’008 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 36 of the ’008 Patent by using the Dalim Accused Workflow Products.

148. Dalim has had knowledge of the ’008 Patent since at least February 18, 2016.

149. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

COUNT XIII: INFRINGEMENT OF U.S. PATENT ’008 CLAIM 41

150. RAH Color Technologies incorporates by reference the allegations set forth in paragraphs 1-32 and 101-115 of this Complaint as though set forth in full herein.

151. Claim 41 of the ’008 Patent provides:

Claim 41	The method according to claim 28 further comprising the step of configuring a workflow for processing said color image data by assembling elements representative of said workflow on the display.

152. Dalim Accused Workflow Products allow for the creation and configuration of custom workflows for processing of color images. Custom workflows are created and configured using Dalim Accused Workflow Products by dragging and dropping workflow steps onto a field in the user interface, and linking the steps together.

153. Dalim infringes claim 41 of the ’008 Patent when it makes, imports, uses, sells and offers for sale the Dalim Accused Workflow Products, including its use in relation to product testing and improvement responsive to user feedback, and demonstration at trade shows, sales facilities, customer sites, and training/tutorial videos.

154. In addition, Dalim induces infringement of claim 41 of the ’008 Patent by importing and selling the Dalim Accused Workflow Products for use by its customers and/or end-users.

155. Upon information and belief, Dalim’s customers and/or end users have directly infringed and are directly infringing each and every claim limitation of at least claim 41 of the ’008 Patent. Dalim actively induces customers and users to directly infringe each and every claim limitation of at least claim 41 of the ’008 Patent under 35 U.S.C. § 271(b). Dalim has been and is knowingly inducing its customers and/or end users to directly infringe at least claim 41 of the ’008 Patent with the specific intent to encourage such infringement, and knowing that the acts induced constitute patent infringement. Dalim’s inducement includes, for example, providing extensive training and technical guides, product data sheets, demonstrations, software and hardware specifications, installation guides, and other forms of support (e.g., maintenance contracts, consulting services, system integration) that induce its customers and/or end users to directly infringe at least claim 41 of the ’008 Patent by using the Dalim Accused Workflow Products.

156. Dalim has had knowledge of the ’008 Patent since at least February 18, 2016.

157. As a direct and proximate result of Dalim’s acts of patent infringement, RAH Color Technologies has been and continues to be injured and has sustained, and will continue to sustain, damages.

WILLFUL INFRINGEMENT

158. Dalim has infringed and continues to infringe the above identified claims of each of the Patents-in-Suit despite its knowledge of the Patents-in-Suit and its knowledge that at least Dalim Accused Products, and Dalim Accused Workflow Products were and are using the technology claimed by the Patents-in-Suit since at least February 18, 2016; and the objectively high likelihood that its acts constitute patent infringement.

159. Dalim's infringement of the Patents-in-Suit is willful and deliberate, entitling RAH Color Technologies to enhanced damages under 35 U.S.C. § 284.

160. Dalim's willful infringement and unwillingness to enter into license negotiations with RAH Color Technologies make this an exceptional case such that RAH Color Technologies should be entitled to recover its attorneys' fees and costs incurred in relation to this matter pursuant to 35 U.S.C. §285.

JURY DEMAND

RAH Color Technologies demands a trial by jury on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff RAH Color Technologies requests that this Court enter judgment in its favor and against Dalim as follows:

A. Adjudging, finding, and declaring that Dalim has infringed of the above-identified claims of each of the Patents-in-Suit under 35 U.S.C. § 271;

B. Awarding the past and future damages arising out of Dalim's infringement of the Patents-in-Suit to RAH Color Technologies in an amount no less than a reasonable royalty, together with prejudgment and post-judgment interest, in an amount according to proof;

C. Adjudging, finding, and declaring that Dalim's infringement is willful and enhanced damages and fees as a result of that willfulness under 35 U.S.C. § 284;

D. Adjudging, finding, and declaring that this is an "exceptional" case pursuant to 35 U.S.C. § 285;

E. Awarding attorney's fees, costs, or other damages pursuant to 35 U.S.C. §§ 284 or 285 or as otherwise permitted by law; and

F. Granting RAH Color Technologies such other further relief as is just and proper, or as the Court deems appropriate.

January 14, 2019

Respectfully submitted,

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