

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

MIDWEST ATHLETICS AND SPORTS
ALLIANCE LLC,

Plaintiff,

v.

XEROX CORP.,

Defendant.

Case No.:

**COMPLAINT FOR PATENT
INFRINGEMENT**

JURY TRIAL REQUESTED

Plaintiff Midwest Athletics and Sports Alliance LLC (“MASA”) files this Complaint for Patent Infringement and Jury Demand against Defendant Xerox Corporation (“Defendant” or “Xerox”) and alleges as follows:

THE PARTIES

1. MASA, a wholly-owned subsidiary of Midwest Youth A&S, Inc. (a Delaware public benefit corporation), is a Delaware limited liability corporation with its principal place of business at 1321 Jones Street, Suite 206, Omaha, NE 68102.

2. MASA provides services, funding and equipment for youth sports organizations to help those organizations inspire youths in a positive way and promotes the value and importance of sports and physical activity in the development of children. MASA believes in the principles of positive coaching and mentorship to not only ensure that each child learns the skills, tactics and strategies of the game but also learns the value of sportsmanship, problem-solving and leadership skills. MASA’s ultimate purpose is to see that every child has the ultimate sports experience and learns key life lessons that will be instrumental for them now and in the future.

3. Defendant is an American corporation that sells document solutions and services, and document technology products worldwide.

4. Defendant is a New York corporation, with its principal place of business at 201 Merritt 7, Norwalk, Connecticut, 06851.

JURISDICTION AND VENUE

5. This action arises under the Patent Act, 35 U.S.C. § 101 *et seq.* This Court has original jurisdiction over this controversy pursuant to 28 U.S.C. §§ 1331 and 1338.

6. This Court has personal jurisdiction over Defendant. Defendant does business in this District and has, and continues to, infringe MASA's patents (described below) in this District. Defendant is incorporated in the State of New York. In addition, the Court has personal jurisdiction over Defendant because Defendant has established minimum contacts with the forum and the exercise of jurisdiction would not offend traditional notions of fair play and substantial justice.

7. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b) and (c) and/or 1400(b).

THE PATENTS-IN-SUIT

8. MASA owns the following United States Patents: 7,502,582, 7,720,425, and 8,005,415 (collectively referred to as the "Pentachrome Patents").

9. On March 10, 2009, U.S. Patent No. 7,502,582 ("the '582 Patent") (Ex. A), entitled METHOD AND APPARATUS FOR PRINTING USING A TANDEM ELECTROSTATOGRAPHIC PRINTER, was issued to Yee S. Ng and Robert C. Logel. A true and correct copy of the '582 Patent is attached to this Complaint as Exhibit A and is incorporated by reference herein.

10. All rights, title, and interest in the '582 Patent have been assigned to MASA, who is the sole owner of the '582 Patent. On April 18, 2019, MASA and Commercial Copy

Innovations LLC executed an assignment confirming MASA's ownership of U.S. Patent Nos. 7,236,734 and 7,340,208, which are referenced in terminal disclaimers contained in the file history of the '582 Patent.

11. The '582 Patent's abstract states that this patent is generally directed towards a tandem color electrostatographic printer apparatus having five or more color printing stations or modules for applying respective color separation toner images to a receiver member to form a pentachrome color image in a single pass.

12. On May 18, 2010, U.S. Patent No. 7,720,425 ("the '425 Patent") (Ex. B), entitled METHOD AND APPARATUS FOR PRINTING USE A TANDEM ELECTROSTATOGRAPHIC PRINTER, was issued to Yee S. Ng and Robert C. Logel. A true and correct copy of the '425 Patent is attached to this Complaint as Exhibit B and is incorporated by reference herein.

13. All rights, title, and interest in the '425 Patent have been assigned to MASA, who is the sole owner of the '425 Patent. On April 18, 2019, MASA and Commercial Copy Innovations LLC executed an assignment confirming MASA's ownership of U.S. Patent Nos. 7,236,734 and 7,340,208, which are referenced in terminal disclaimers contained in the file history of the '425 Patent.

14. The '425 Patent's abstract states that this patent is generally directed towards a tandem color electrostatographic printer apparatus having five or more color printing stations or modules for applying respective color separation toner images to a receiver member to form a pentachrome color image in a single pass.

15. On Aug. 23, 2011, U.S. Patent No. 8,005,415 ("the '415 Patent") (Ex. C), entitled METHOD AND APPARATUS FOR PRINTING USE A TANDEM

ELECTROSTATOGRAPHIC PRINTER, was issued to Yee S. Ng and Robert C. Logel. A true and correct copy of the '415 Patent is attached to this Complaint as Exhibit C and is incorporated by reference herein.

16. All rights, title, and interest in the '415 Patent have been assigned to MASA, who is the sole owner of the '415 Patent. On April 18, 2019, MASA and Commercial Copy Innovations LLC executed an assignment confirming MASA's ownership of U.S. Patent Nos. 7,236,734 and 7,340,208, which are referenced in terminal disclaimers contained in the file history of the '415 Patent.

THE ACCUSED PRODUCTS

17. Xerox makes, uses, sells, offers for sale, and/or imports into the United States and this District a variety of office equipment, including printers, scanners, and/or multifunction systems that include functionality such as printing, scanning and copying (the "Xerox Office Equipment").

18. The Xerox Office Equipment includes a variety of printer models, including those referred to as iGen Printers (e.g. Xerox iGen 5) (the "Pentachrome Accused Products").

19. A depiction of an iGen printer is provided below:



Ex. D (PDF of <https://www.xerox.com/digital-printing/digital-printing-press/color-printing/xerox-igen5/enus.html>).

20. Various models of the iGen printers (e.g., Xerox iGen 5) use one or more of the MASA Patents.

COUNT I
(Direct Infringement of the ‘582 Patent pursuant to 35 U.S.C. § 271(a))

21. MASA repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

22. Defendant has infringed and continues to infringe one or more claims of the ‘582 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a).

23. Defendant’s infringement is based upon literal infringement or infringement under the doctrine of equivalents, or both.

24. Defendant’s acts of making, using, importing, selling, and/or offering for sale infringing products and services have been without the permission, consent, authorization or license of MASA.

25. Defendant’s infringement includes the manufacture, use, sale, importation and/or offer for sale of Defendant’s products and services, such as Xerox iGen 5 Press.

26. Claim 1 of the ‘582 Patent is recited below:

A method of printing to form colored images with improved color gamut and enhanced gloss, the method comprising:

1[a] forming a color print using five or more different color pigments which in combination form at least a pentachrome color image;

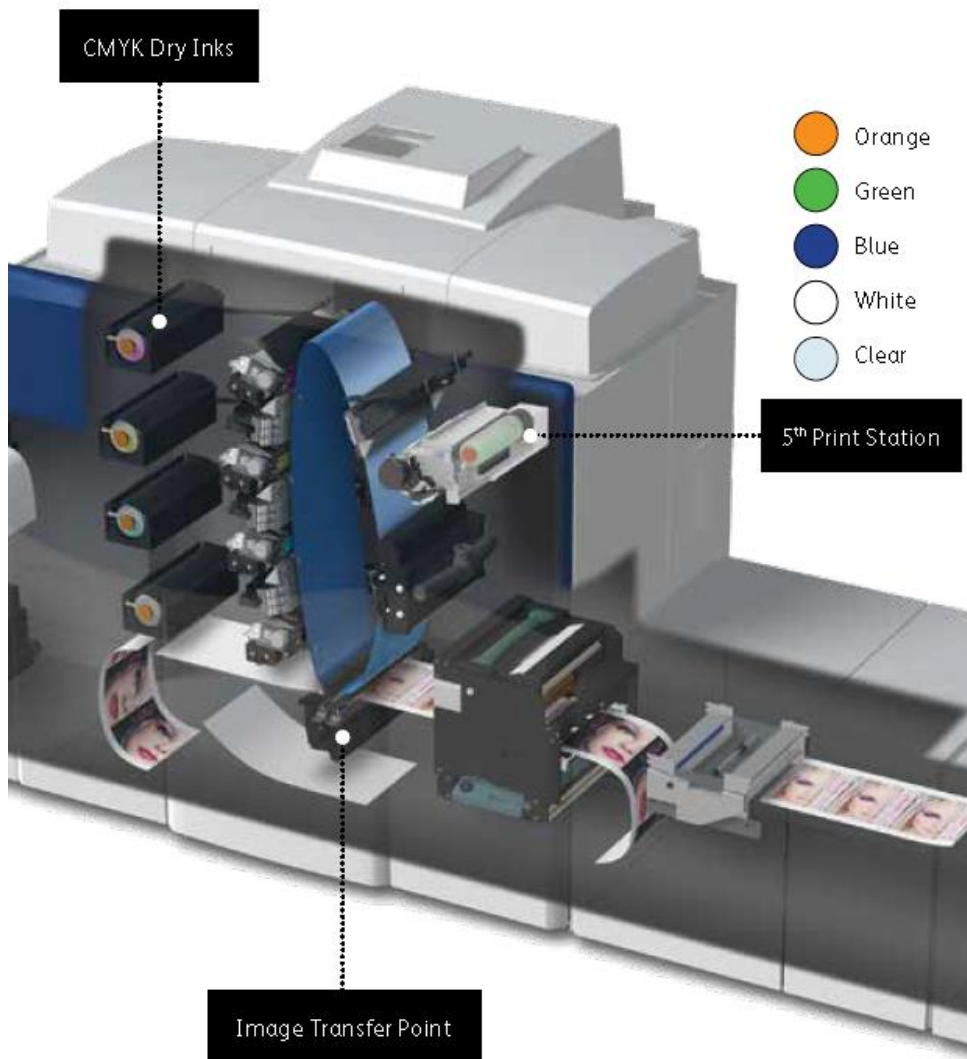
1[b] depositing a clear toner overcoat to the at least pentachrome color image, wherein the clear toner overcoat is formed as a receiver and image dependent inverse mask; and

1[c] subjecting the clear toner overcoat and the at least pentachrome color image to a gloss enhancing process.

27. As one example, Xerox iGen 5 Press meets the limitations of claim 1 of the ‘582 Patent for at least the reasons described below.

28. In general and as explained below, the limitations of claim 1 are satisfied because Xerox iGen 5 Press system performs a method of printing to form colored images (using five color pigments) with improved color gamut and enhanced gloss.

29. As shown below, Xerox iGen 5 Press forms colored images using the standard CMYK (cyan, magenta, yellow, black) gamut of four colors. A fifth color is provided such as orange, green, blue, or white can supplement the standard CMYK pallet of four colors to improve the press's gamut by adding the fifth color.



Ex. E (Brochure - Design and file preparation guidelines at p. 5).

30. As shown below, Xerox iGen 5 Press may be used in conjunction with a UV Coater such as the TEC Lighting Production UV Coater to apply an enhanced gloss to the image with the improved color gamut.

TEC Lighting Production UV Coater

Enhance and protect your applications with the TEC Lighting Production UV Coater. The Production UV Coater is the first inline duplex coating solution uniquely designed to work with Xerox® presses. The inline coater eliminates the need for separate coating operations; this automated process is all done with just the touch of a button. And you can switch coatings easily and quickly between jobs. The Production UV Coater allows you to produce the highest quality glossy or matte coated applications as quickly and easily as they can be printed. After they're printed inline with a Xerox® press, your pieces will retain their beauty and be protected from potential damage due to handling or scuffing from downstream processes.

Benefits

- ◆ Enhances your shop's offerings by enabling seamless production of coated applications at the touch of a button.
- ◆ Provides an esthetically pleasing look to applications such as photos, posters, books and booklets, business cards, postcards and more.
- ◆ Extends the life of output and protects it from dirt, smudges, fingerprints and scratches that can occur from mailing or handling.
- ◆ Fast and easy startup and cleanup.
- ◆ Allows operators to swap out rollers in just a few minutes so you can easily switch coatings from one job to the next.
- ◆ Leverages existing technology investments by seamlessly integrating with a variety of Xerox® production and light production devices.
- ◆ Saves time and reduces labor costs with a streamlined, inline workflow.

Ex. F (Brochure - Xerox iGen 5 Press Finishing at p. 13).

31. Claim limitation 1[a] is satisfied for at least the following reasons. Xerox iGen 5 Press forms a color print using five or more different color pigments which in combination form at least a pentachrome color image. As shown below, Xerox iGen 5 produces a color image by combining colors from five different toners. For example, Xerox iGen 5 Press combines four pigments such as the CMYK dry inks with a fifth pigment color, such as orange, green, or blue to form a pentachrome color image.

It's a wonderful, colorful world — A 5th color.

Signature iGen[®] configurability is now extended with the option for a 5th color that dramatically increases your ability to match a wider variety of PANTONE[®] colors.

It lets you quickly load Orange, Green or Blue as a supplement to CMYK, extending the press's gamut and making it easy to match a wider variety of spot colors, increasing your ability to keep print buyers on-brand. [Learn more >](#)



Ex. G (PDF of <http://xeroxigen5press.freeflowdp.com/xeroxigen5press>).

32. Claim limitation 1[b] is satisfied for at least the following reasons. Xerox iGen 5 Press deposits a clear toner overcoat to the at least pentachrome color image, wherein the clear toner overcoat is formed as a receiver and image dependent inverse mask.

33. As shown below, Xerox iGen 5 Press's clear dry ink of the fifth color may be substituted with a clear dry ink in the fifth print station to deposit a clear toner overcoat on a second pass through the printer after a pentachrome image has been produced in a first, preceding pass.

MORE POSSIBILITIES – AND EVEN MORE VALUE.

The Xerox[®] iGen[®] 5 has a well-earned reputation for delivering high-quality, high-value digital output — and with the option to run Xerox[®] ClearDry Ink in the 5th print station, it can elevate your printing capabilities to a whole new level. The iGen[®] 5 allows you to use Clear Dry Ink to incorporate a specialty effect for both static and variable page content. Need to highlight an image, draw attention to a headline, or apply a watermark? No problem! The iGen[®] 5 + Clear Dry Ink makes it easy — and delivers amazing results every time.

Ex. H (Brochure – Xerox iGen 5 Press Clear Dry Ink at p. 1).

34. As shown below, Xerox iGen 5 Press permits the clear toner overcoat to be formed as a receiver and image dependent inverse mask such as by permitting one to highlight images to add visual interest, accentuate a headline and variable text, enhance photos, logos, or variable images, simulate a pearlescent or metallic sheen, and/or apply watermarks to enhance security with the clear dry ink from which the receiver is formed.

EFFECTS THIS VALUABLE SELL THEMSELVES.

It's easy to see what Clear can do

Simply take a look at a few print samples, and the value of Clear Dry Ink becomes incredibly... clear. The visual variety and artistic effects it can produce are a fantastic (and easy) way to help your customers emphasize important content and make an eye-catching impression that drives results.

A Highlight images to add visual interest

B Accentuate a headline or variable text

C Enhance photos, logos, or variable images

D Simulate a pearlescent or metallic sheen

E Apply watermarks to enhance security

Ex. H (Brochure – Xerox iGen 5 Press Clear Dry Ink at p. 2).

35. Claim limitation 1[c] is satisfied for at least the following reasons. Xerox iGen 5 Press subjects the clear toner overcoat and the at least pentachrome color image to a gloss enhancing process.

36. As shown below, the clear toner overcoat and the pentachrome color image is subject to a gloss enhancing process through a system which includes a TEC Lighting Production UV Coater whereby the UV Coater produces the highest quality, glossy coated image.

TEC Lighting Production UV Coater

Enhance and protect your applications with the TEC Lighting Production UV Coater. The Production UV Coater is the first inline duplex coating solution uniquely designed to work with Xerox® presses. The inline coater eliminates the need for separate coating operations; this automated process is all done with just the touch of a button. And you can switch coatings easily and quickly between jobs. The Production UV Coater allows you to produce the highest quality glossy or matte coated applications as quickly and easily as they can be printed. After they're printed inline with a Xerox® press, your pieces will retain their beauty and be protected from potential damage due to handling or scuffing from downstream processes.

Benefits

- ◆ Enhances your shop's offerings by enabling seamless production of coated applications at the touch of a button.
- ◆ Provides an aesthetically pleasing look to applications such as photos, posters, books and booklets, business cards, postcards and more.
- ◆ Extends the life of output and protects it from dirt, smudges, fingerprints and scratches that can occur from mailing or handling.
- ◆ Fast and easy startup and cleanup.
- ◆ Allows operators to swap out rollers in just a few minutes so you can easily switch coatings from one job to the next.
- ◆ Leverages existing technology investments by seamlessly integrating with a variety of Xerox® production and light production devices.
- ◆ Saves time and reduces labor costs with a streamlined, inline workflow.

Ex. F (Brochure - Xerox iGen 5 Press Finishing at p. 13).

37. Xerox also infringes under the doctrine of equivalents because it meets at least, and by way of example, the following claim limitation(s) of representative Claim 1 by performing substantially the same function as this limitation, performing this function in substantially the same way as this limitation, and achieving substantially the same results as claim element 1[b]. For example, and without limitation, Xerox iGen 5 Press performs substantially the same function in substantially the same way and achieves substantially the same result at least

because it forms at least a pentachrome color image in a plurality of passes; for example, if a White and CMYK (cyan, magenta, yellow, black) colors are to be applied to a sheet with no overlap, White may be applied in a first pass and the CMYK may be applied in a second pass.

38. As a result of Defendant's unlawful activities, MASA has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, MASA is entitled to preliminary and/or permanent injunctive relief.

39. Defendant's infringement of the '582 Patent has injured and continues to injure MASA in an amount to be proven at trial.

COUNT II

(Direct Infringement of the '425 Patent pursuant to 35 U.S.C. § 271(a))

40. MASA repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

41. Defendant has infringed and continues to infringe one or more claims of the '425 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a).

42. Defendant's infringement is based upon literal infringement or infringement under the doctrine of equivalents, or both.

43. Defendant's acts of making, using, importing, selling, and/or offering for sale infringing products and services have been without the permission, consent, authorization or license of MASA.

44. Defendant's infringement includes the manufacture, use, sale, importation and/or offer for sale of Defendant's products and services, such as Xerox iGen 5.

45. Claim 1 of the '425 Patent is recited below:

In a tandem color electrostatographic printer apparatus having five or more color printing stations for applying respective color separation toner images to a receiver member, a method of forming a pentachrome color image comprising:

1[a] passing a receiver member through the printer apparatus to serially deposit thereon in a single pass at least five different colors which form various combinations of color at different pixel locations to form a pentachrome image thereon;

1[b] a first fusing step of fusing the pentachrome image by passing the receiver member through a fuser station;

1[c] passing the receiver member a second time through the printer apparatus, and depositing a clear toner overcoat to the fused pentachrome toner image; and

1[d] a second fusing step of passing the receiver member with the clear toner overcoat and fused pentachrome toner image again through the aforementioned fuser station to fix the clear toner overcoat to the receiver member.

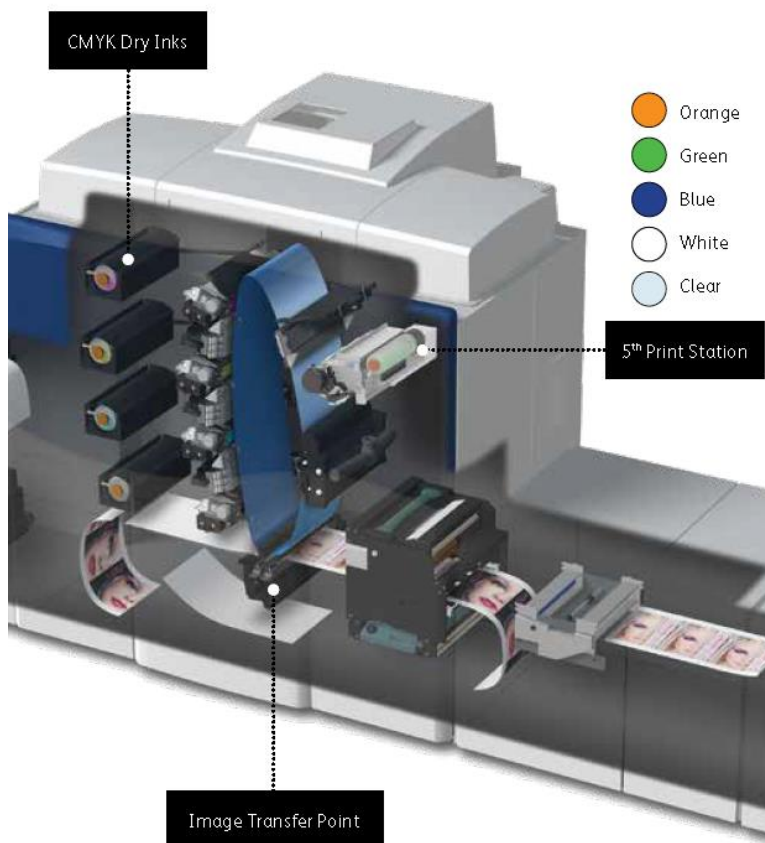
46. As one example, the Xerox iGen 5 Press meets the limitations of claim 1 of the '425 Patent for at least the reasons described below.

47. An image of the Xerox iGen 5 Press is provided below:



48. In general and as explained below, the limitations of claim 1 are satisfied for at least the following reasons. As shown below, the Xerox iGen 5 has five dry ink print stations which include four vertically-disposed, tandem stations having the dry inks for the standard CMYK (cyan, magenta, yellow, black) pallet of four colors, and a fifth print station to extend the color gamut with a fifth color of orange, green, blue, or white. The stations of the five colored toners apply a color separation toner image that is received by a receiver member, where the receiver member could be a sheet of paper passing along a path as illustrated to form pentachrome color image.

49. Claim limitation 1[a] is satisfied for at least the following reasons. As shown below, the Xerox iGen 5 passes a receiver, such as paper, through the printer apparatus as illustrated to serially deposit thereon in a single pass at least five different colors by the vertically-disposed CMYK dry inks and a fifth dry ink to form a pentachrome image on the paper at the image transfer point in one pass.



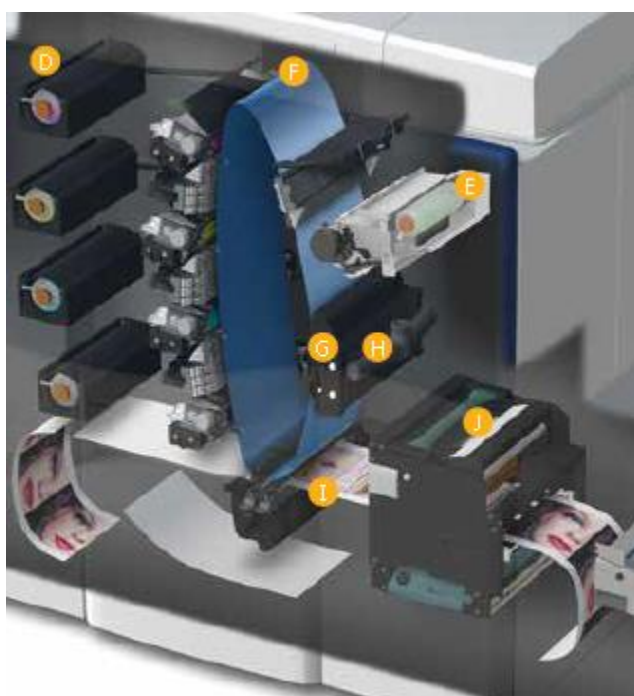
Ex. E (Brochure - Design and file preparation guidelines at p. 5).

50. As shown below, the Xerox iGen allows for various combinations of color may be formed at different pixel locations to form a pentachrome image.



Ex. I (Brochure – Xerox iGen 5 Press at p. 9).

51. Claim limitation 1[b] is satisfied for at least the following reasons. As shown below, the Xerox Printer includes a fuser station, such as the illustrated fuser (identified below as “J”), for fusing a pentachrome toner image printed on the receiver (such as paper) when the receiver passes by the fuser station such as the fuser.



- I** Single-point Transfer
Single-point image transfer to paper with speeds up to 9,000 A4 (150 per minute 3-up on 14.33" x 26", 75 per minute 2-up on 11" x 17") 4/0 impressions per hour.
- Acoustic Transfer Assist Option
Sound waves help to embed toner into media, enhancing print quality on rough or textured stocks.
- J** Intelligent Fusing
Intelligent fusing adjusts for differences in stock, runs every sheet at rated speed.

Ex. J (Specifications – Xerox iGen 5 Press at pp. 2 – 3).

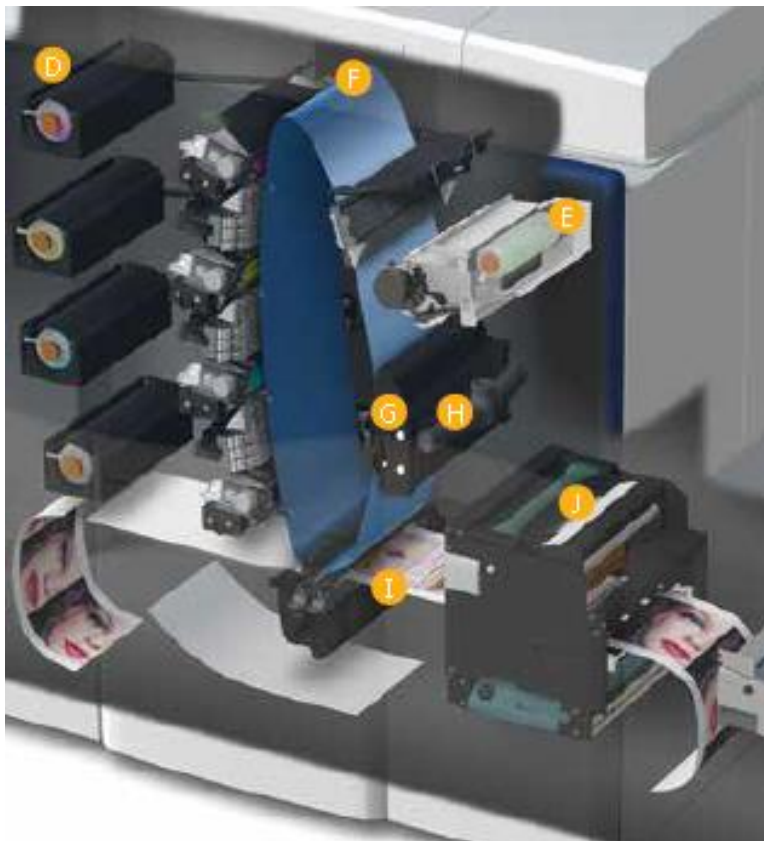
52. Claim limitation 1[c] is satisfied for at least the following reasons. As shown below, the Xerox iGen 5 performs a second fusing step of passing the receiver member, such as paper, through for a second pass to receive a deposit of the clear toner overcoat such as the clear dry ink onto the fused pentachrome toner image that was fused in the first pass.

**MORE POSSIBILITIES –
AND EVEN MORE VALUE.**

The Xerox® iGen® 5 has a well-earned reputation for delivering high-quality, high-valued digital output — and with the option to run Xerox® ClearDry Ink in the 5th print station, it can elevate your printing capabilities to a whole new level. The iGen® 5 allows you to use Clear Dry Ink to incorporate a specialty effect for both static and variable page content. Need to highlight an image, draw attention to a headline, or apply a watermark? No problem! The iGen® 5 + Clear Dry Ink makes it easy — and delivers amazing results every time.

Ex. H (Brochure – Xerox iGen 5 Press Clear Dry Ink at p. 1).

53. Claim limitation 1[d] is satisfied for at least the following reasons. As shown below, the Xerox iGen 5 includes a fuser station such as the illustrated fuser (identified below as “J”) for fusing the clear toner overcoat of the clear dry ink and fused pentachrome toner image printed on the receiver such as paper when the receiver passes by the fuser station in a second pass.



- I** Single-point Transfer
Single-point image transfer to paper with speeds up to 9,000 A4 (150 per minute 3-up on 14.33" x 26", 75 per minute 2-up on 11" x 17") 4/0 impressions per hour.
- J** Acoustic Transfer Assist Option
Sound waves help to embed toner into media, enhancing print quality on rough or textured stocks.
- J** Intelligent Fusing
Intelligent fusing adjusts for differences in stock; runs every sheet at rated speed.

Ex. J (Specifications – Xerox iGen 5 Press at pp. 2 – 3).

54. Xerox also infringes under the doctrine of equivalents because it meets at least, and by way of example, the following claim limitation(s) of representative Claim 1 by performing substantially the same function as this limitation, performing this function in substantially the same way as this limitation, and achieving substantially the same results as claim limitation 1[b]. For example, and without limitation, Xerox iGen 5 performs substantially the same function in substantially the same way and achieves substantially the same result at least because it serially deposits five different colors on a receiver by serially depositing five different colors on an image transfer belt unit.

55. As a result of Defendant's unlawful activities, MASA has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, MASA is entitled to preliminary and/or permanent injunctive relief.

56. Defendant's infringement of the '425 Patent has injured and continues to injure MASA in an amount to be proven at trial.

COUNT III
(Direct Infringement of the '415 Patent pursuant to 35 U.S.C. § 271(a))

57. MASA repeats, realleges, and incorporates by reference, as if fully set forth herein, the allegations of the preceding paragraphs, as set forth above.

58. Defendant has infringed and continues to infringe one or more claims of the '415 Patent, including at least claim 1, in violation of 35 U.S.C. § 271(a).

59. Defendant's infringement is based upon literal infringement or infringement under the doctrine of equivalents, or both.

60. Defendant's acts of making, using, importing, selling, and/or offering for sale infringing products and services have been without the permission, consent, authorization or license of MASA.

61. Defendant's infringement includes the manufacture, use, sale, importation and/or offer for sale of Defendant's products and services, such as Xerox iGen 5 Press.

62. Claim 1 of the '415 Patent is recited below:

A system for printing color images comprising:

1[a] a tandem color electrostatographic printer apparatus having five or more color printing stations for applying respective color separation toner images to a receiver member passing therethrough in a single pass to form a pentachrome color image;

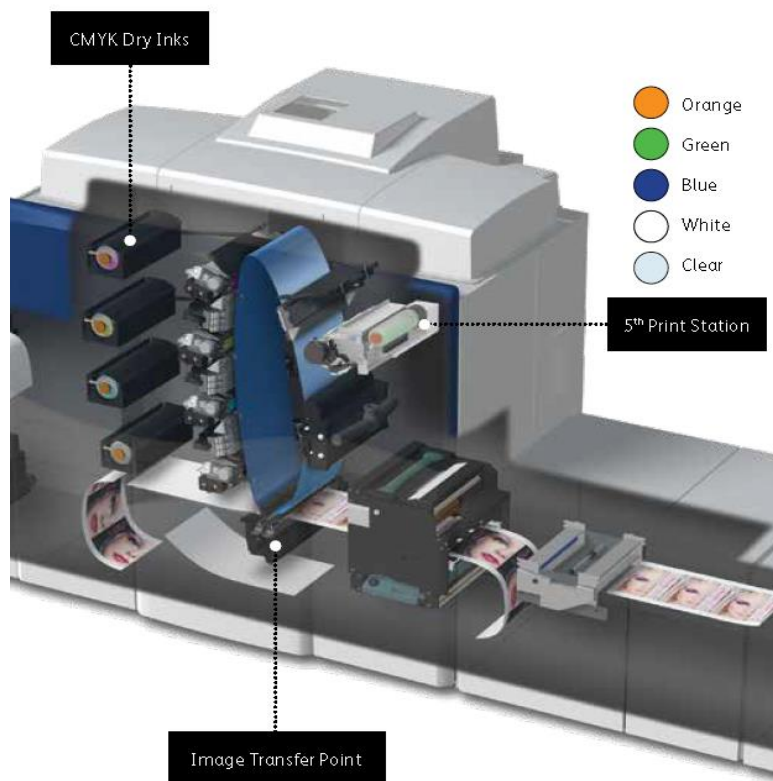
1[b] a fusing station for fusing the pentachrome image;

1[c] a clear toner overcoat printing station for applying a clear toner overcoat to the fused pentachrome toner image; and

1[d] a belt glosser for providing enhanced gloss to the pentachrome color image having a clear overcoat.

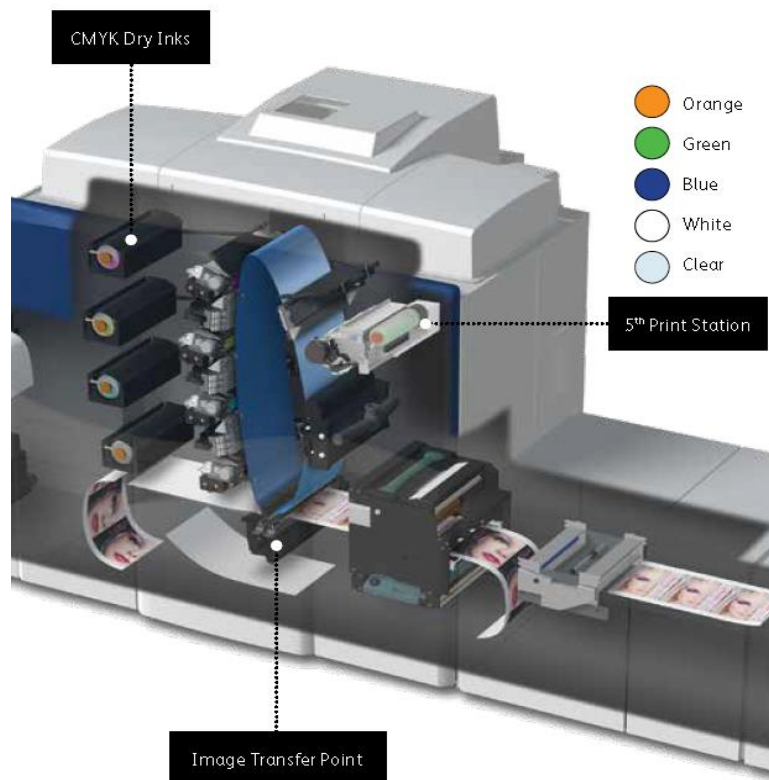
63. As one example, Xerox iGen 5 Press meets the limitations of claim 1 of the '415 Patent for at least the reasons described below.

64. In general and as explained below, the limitations of claim 1 are satisfied because, as shown below, Xerox iGen 5 Press is a system for color printing images using colors such as, for example, the standard CMYK (cyan, magenta, yellow, black) pallet of four colors plus a fifth color such as, for example, orange, green, blue, or white.



Ex. E (Brochure – Design and file preparation guidelines at p. 5).

65. Claim limitation 1[a] is satisfied for at least the following reasons. As shown below, Xerox iGen 5 Press is an electrostatographic printer having five dry ink print stations (color printing stations) as illustrated by four vertically-disposed, tandem stations having the dry inks for the standard CMYK (cyan, magenta, yellow, black) pallet of four colors, and a fifth print station for a fifth dry ink having a color of orange, green, blue, or white.



Ex. E (Brochure - Design and file preparation guidelines at p. 5).

66. As shown below, the stations of the five colored toners apply respective color separation toner images to a receiver member, such as a sheet of paper, to form a single image with five colors (a pentachrome color image) in a single pass through the printer.

It's a wonderful, colorful world — A 5th color.

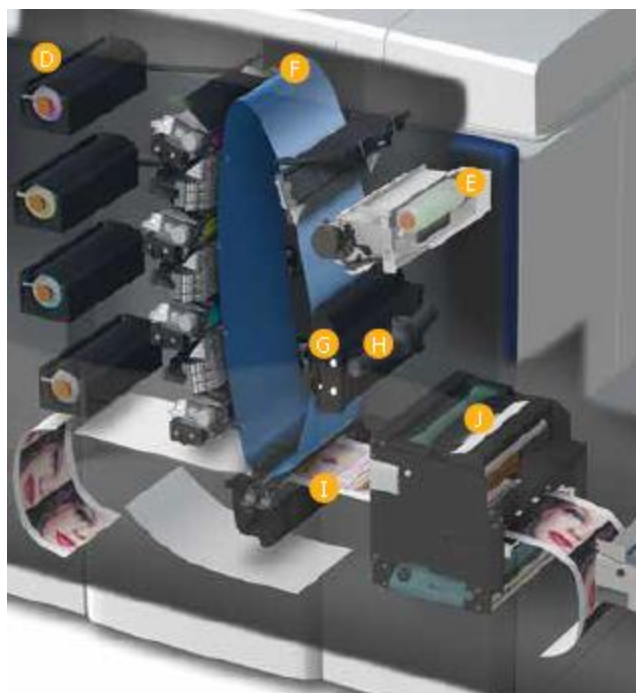
Signature iGen[®] configurability is now extended with the option for a 5th color that dramatically increases your ability to match a wider variety of PANTONE[®] colors.

It lets you quickly load Orange, Green or Blue as a supplement to CMYK, extending the press's gamut and making it easy to match a wider variety of spot colors, increasing your ability to keep print buyers on-brand. [Learn more >](#)



Ex. G (PDF of <http://xeroxigen5press.freeflowdp.com/xeroxigen5press>).

67. Claim limitation 1[b] is satisfied for at least the following reasons. As shown below, Xerox iGen 5 Press includes a fuser station, such as the illustrated fuser (identified below as “J”) for fusing the pentachrome toner image printed on the receiver member (e.g., a sheet of paper) when the receiver passes by the fuser of the fuser station.



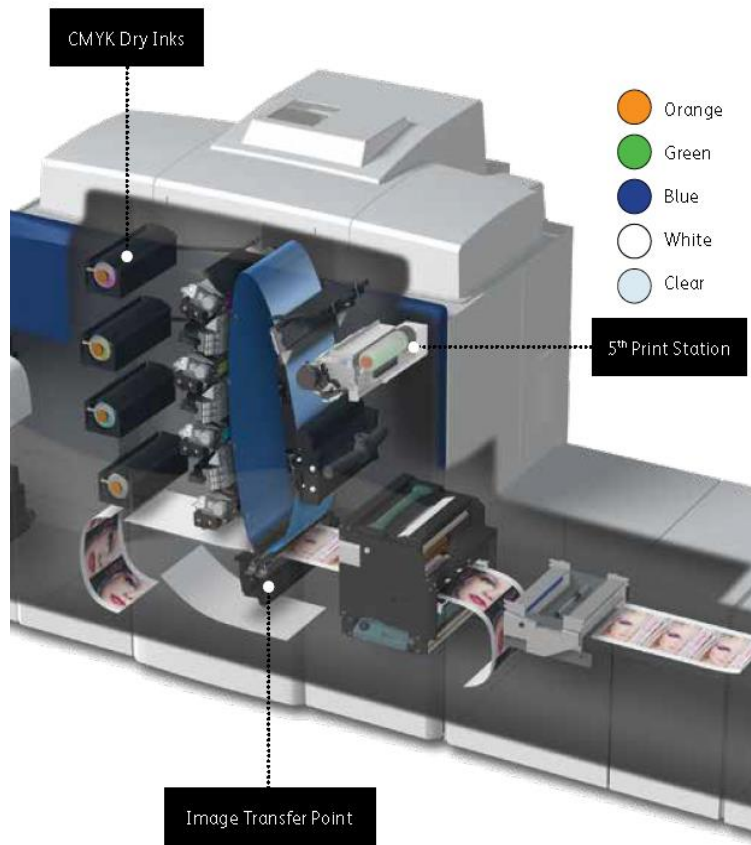
I
Single-point Transfer
Single-point image transfer to paper with speeds up to 9,000 A4 (150 per minute 3-up on 14.33" x 26", 75 per minute 2-up on 11" x 17") 4/0 impressions per hour.

Acoustic Transfer Assist Option
Sound waves help to embed toner into media, enhancing print quality on rough or textured stocks.

J
Intelligent Fusing
Intelligent fusing adjusts for differences in stock; runs every sheet at rated speed.

Ex. J (Specifications – Xerox iGen 5 Press at pp. 2 – 3).

68. Claim limitation 1[c] is satisfied for at least the following reasons. As shown below, Xerox iGen 5 Press may provide a clear toner overcoat station, such as in a fifth printing station, that would be installed with clear dry ink (clear toner overcoat).



Ex. E (Brochure - Design and file preparation guidelines at p. 5).

69. As shown below, Xerox iGen 5 Press may apply a clear toner overcoat to the fused pentachrome toner image such as when clear dry ink is employed to highlight an image, draw attention of a headline, or apply a watermark.

**MORE POSSIBILITIES –
AND EVEN MORE VALUE.**

The Xerox® iGen® 5 has a well-earned reputation for delivering high-quality, high-value digital output — and with the option to run Xerox® Clear Dry Ink in the 5th print station, it can elevate your printing capabilities to a whole new level. The iGen® 5 allows you to use Clear Dry Ink to incorporate a specialty effect for both static and variable page content. Need to highlight an image, draw attention to a headline, or apply a watermark? No problem! The iGen® 5 + Clear Dry Ink makes it easy — and delivers amazing results every time.

Ex. H (Brochure – Xerox iGen 5 Press Clear Dry Ink at p. 1).

70. Claim limitation 1[d] is satisfied for at least the following reasons. Xerox iGen 5 Press comprises a belt glosser for providing enhanced gloss to the pentachrome color image having the clear toner overcoat. As shown below, Xerox iGen 5 Press system includes a Duplo Ultra 145A/205A UV Offline Coater which serves to enhance a pentachrome color image having a clear overcoat with Coating.

Finishing Type	Product	Compatibility		
		Xerox® Color 8250 Production Printer	Xerox® iGen4® Press	Xerox® iGen® 5 Press
Booklets (Saddle-Stitched)	C.P. Bourg® BDF-e Booklet Maker	x	x	x
	C.P. Bourg BM-e Booklet Maker	x	x	x
	Duplo® DBM-5001 Inline Booklet Maker	x	x	x
	Watkiss PowerSquare™ 224	x	x	x
Coating	Duplo Ultra 145A/205A UV Offline Coater	x	x	x
	Epic CTI-635™ Inline Coating System	x	x	x
	TEC Lighting Production UV Coater	x	x	x
	TRESU Pinta Coater	x	x	x
Feeding/Bypass	C.P. Bourg Dual-Mode Sheet Feeder (BSF)	x	x	x
Packaging	Xerox® Automated Packaging Solution		x	x
Perfect Bound	C.P. Bourg 3202 Book Factory	x	x	x
Punch/Lay Flats	GB® FusionPunch® II	x	x	x
Slit/Cut/Crease	Duplo Slitter/Cutter/Creaser (SCC) Nearline Booklet Maker	x	x	x
	Duplo DC-645 Slitter/Cutter/Creaser	x	x	x
	Duplo DC-745 Slitter/Cutter/Creaser	x	x	x
	Rollem JetSlit	x	x	x
Stack/Bypass	22.5" (572 mm) Stacker	x	x	
	26" (660 mm) Stacker		x	x
	Multigraf PST-52 Stacker	x	x	x
Stitched Sets	C.P. Bourg BDF-e Booklet Maker	x	x	x

Ex. F (Brochure – Xerox iGen 5 Press Finishing at p. 2).

71. As shown below, the Duplo 145A UV Coater has a belt glosser such as the belt that is moving within the unit.



Ex. K (PDF of <https://youtu.be/SrR1drWNcqk?t=217>) (Duplo 145A UV Coater video presentation) (showing a moving belt transporting paper within a 8440 Duplo 145A UV Coater at time 3:37 / 4:51)

72. Xerox also infringes under the doctrine of equivalents because it meets at least, and by way of example, the following claim limitation(s) of representative Claim 1 by performing substantially the same function as this limitation, performing this function in substantially the same way as this limitation, and achieving substantially the same results as claim limitation 1[c]. For example, and without limitation, Xerox iGen 5 Press performs substantially the same function in substantially the same way and achieves substantially the same result at least because the clear toner overcoat printing station is one of the five color printing stations used to form a pentachrome image, where color toner installed at one of the five stations used to form the pentachrome image in a first pass may be substituted with clear toner that is applied to a fused pentachrome image during a second pass.

73. As a result of Defendant's unlawful activities, MASA has suffered and will continue to suffer irreparable harm for which there is no adequate remedy at law. Accordingly, MASA is entitled to preliminary and/or permanent injunctive relief.

74. Defendant's infringement of the '415 Patent has injured and continues to injure MASA in an amount to be proven at trial.

PRAYER FOR RELIEF

WHEREFORE, MASA prays for judgment and relief as follows:

A. An entry of judgment holding Defendant has infringed and is infringing United States Patent Nos. 7,502,582, 7,720,425, and 8,005,415;

B. A preliminary and permanent injunction against Defendant and its respective officers, directors, agents, servants, affiliates, employees, divisions, branches, subsidiaries, parents and all others acting in active concert therewith from infringing United States Patent Nos. 7,502,582 , 7,720,425, and 8,005,415 and for all further and proper injunctive relief pursuant to 35 U.S.C. § 283;

C. An award to MASA of such damages as it shall prove at trial against Defendant that are adequate to fully compensate MASA for Defendant's infringement of United States Patent Nos. 7,502,582 , 7,720,425, and 8,005,415, said damages to be no less than a reasonable royalty;

D. A finding that this case is "exceptional" and an award to MASA of its costs and reasonable attorney's fees, as provided by 35 U.S.C. § 285;

E. An accounting of all infringing sales and revenues, together with post judgment interest and prejudgment interest from the first date of infringement of United States Patent Nos. 7,502,582 , 7,720,425, and 8,005,415; and

F. Such further and other relief as the Court may deem proper and just.

DEMAND FOR JURY TRIAL

MASA demands a jury trial on all issues so triable.

Respectfully submitted,

Dated: September 12, 2019

By: /s/ Steven E. Cole
Steven E. Cole

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