

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

SEIKO EPSON CORPORATION,
a Japan corporation; **EPSON
AMERICA, INC.**, a California
corporation; and **EPSON PORTLAND
INC.**, an Oregon corporation,

Plaintiffs,

v.

BCH TECHNOLOGIES LLC, a North
Carolina limited liability company; **MAX
MART LLC**, a North Carolina limited
liability company; **ZHUHAI DU FU E-
COMMERCE CO., LTD.**, a Hong
Kong, China company d/b/a Do-It
Industrial Company Ltd.; **ZHUHAI
XIAOHUI E-COMMERCE CO., LTD.**,
a Hong Kong, China company; **KEVIN
DAY**, an individual; and **SHENGTENG
HU**, an individual.

Defendants.

Civil No. 1:19-cv-01067

**COMPLAINT FOR:
PATENT INFRINGEMENT
DEMAND FOR JURY TRIAL**

Plaintiffs Seiko Epson Corporation, Epson America, Inc., and Epson Portland Inc., (collectively, "Epson"), for their Complaint herein, allege as follows:

NATURE OF THE ACTION

1. This is an action for patent infringement of United States Patent No. 6,955,422 ("the '422 patent"), United States Patent No. 8,794,749 ("the '749 patent"), and United States Patent No. 8,454,116 ("the '116 patent") (collectively "Epson Patents") arising under the patent laws of the United States, 35 U.S.C. § 1 *et. seq.*

2. The infringing products at issue are aftermarket ink cartridges for use with Epson printers. Over the years Epson has brought numerous actions in various district courts as well as the United States International Trade Commission ("ITC" or "Commission") for infringement of its patents. In fact, the ITC has issued two general exclusion orders that prohibit the importation of ink cartridges that infringe certain Epson patents, including the three patents asserted in this case. Epson's patent enforcement efforts have been widely publicized and reported by the aftermarket ink cartridge industry and by Epson itself. As a result, the aftermarket ink cartridge industry is intimately familiar with the ITC's general exclusion orders and Epson's patents. Players in the aftermarket ink cartridge industry know that importation and sale of ink cartridges for use with Epson printers may violate the ITC's general exclusion orders and infringe Epson's patents. Epson also gives notice of its patents, including the '422, '749 and '116 patents, by virtual marking of its cartridges pursuant to 35 U.S.C. § 287(a). Nevertheless, infringers continue to import and sell infringing ink

cartridges in flagrant violation of the ITC's general exclusion orders, United States patent law, and Epson's patents.

3. Defendants in this case are willful infringers of Epson's patents, including the '422, '749 and '116 patents, and violators of the ITC's general exclusion orders. Epson brings this action to recover money damages, for a preliminary and permanent injunction, and for other relief as set forth herein.

RELATED ACTIONS

4. This action is related to the following twenty-one actions because one or more of the Epson patents asserted here are or were also asserted in those cases against infringing aftermarket ink cartridges that, from a patent analysis perspective, are the same as the accused products in this case:

- a. *Seiko Epson Corporation, et al. v. STS Refill Technology, LLC, et al.*, Civil No. 9:18-cv-81723-CV-ALTMAN (S.D.FL.), filed on December 17, 2018, currently pending;
- b. *Seiko Epson Corporation, et al. v. CIS Systems, Inc., et al.*, Civil No. 1:18-cv-06586-ENV-PK (N.D.IL.), filed on September 27, 2018, currently pending;
- c. *Seiko Epson Corporation, et al. v. Inkjet2U LLP, et al.*, Civil No. 3:16-cv-2322-YY (D. Or.) filed on December 14, 2016, currently pending;

- d. *Seiko Epson Corporation, et al. v. FTrade Inc., et al.*, Civil No. 1:18-cv-05036-ENV-PK (E.D.N.Y.), filed on September 5, 2018, concluded by settlement, consent judgment and permanent injunction;
- e. *Seiko Epson Corporation, et al. v. Sinotime Technologies, Inc., et al.*, Civil No. 18-cv-22838-Gayles/Otazo-Reyes (S.D. Fla.) filed on July 13, 2018, concluded by settlement, consent judgment and permanent injunction;
- f. *Seiko Epson Corporation, et al. v. EZ Inks et al.*, Civil No. 1:18-cv-01338 (E.D.N.Y.), filed on March 2, 2018, concluded by settlement, consent judgment and permanent injunction;
- g. *Seiko Epson Corporation, et al. v. InkPro2Day, et al.*, Civil No. 2:18-cv-00372-JAD-NJK (D. Nev.) filed on March 1, 2018, concluded by default judgment and permanent injunction;
- h. *Seiko Epson Corporation, et al. v. Prinko Image Co. (USA), Inc.*, Civil No. 2:17-cv-04501-AB (JCx) (C.D. Cal.) filed on June 16, 2017, concluded by default judgment and permanent injunction;
- i. *Seiko Epson Corporation, et al. v. Soldcrazy USA LLC*, Civil No. 2:17-cv-04502-AB (JCx) (C.D. Cal.) filed on June 16, 2017, concluded by default judgment and permanent injunction;

- j. *Seiko Epson Corporation, et al. v. Advance Image Manufacturers, Inc.*, Civil No. 3:17-cv-425-YY (D. Or.) filed on March 16, 2017, concluded by default judgment and permanent injunction;
- k. *Seiko Epson Corporation, et al. v. OW Supplies Corp., et al.*, Civil No. 3:17-cv-363-YY (D. Or.) filed on March 3, 2017, concluded by settlement, consent judgment and permanent injunction;
- l. *Seiko Epson Corporation, et al. v. Ta Trix USA Inc.*, Civil No. 3:17-cv-369-YY (D. Or.) filed on March 3, 2017, concluded by settlement, consent judgment and permanent injunction;
- m. *Seiko Epson Corporation, et al. v. Gaea Supplies Corporation,*, Civil No. 3:17-cv-366-SB (D. Or.) filed on March 3, 2017, concluded by settlement, consent judgment and permanent injunction;
- n. *Seiko Epson Corporation, et al. v. HT Tech, Inc. and HT Imaging Inc.*, Civil No. 3:16-cv-2321-YY (D. Or.) filed December 14, 2016, concluded by settlement, consent judgment and permanent injunction;
- o. *Seiko Epson Corporation, et al. v. Shoppers Smart LLC, Houses Investing, LLLP and Houses Investing Of Florida, Corp.*, Civil No. 3:16-cv-2324-YY (D. Or.) filed on December 14, 2016, concluded by settlement, consent judgment and permanent injunction;

- p. *Seiko Epson Corporation, et al. v. Nano Business & Technology, Inc.*, Civil No. 3:16-cv-02211-YY (D. Or.), filed on November 22, 2016, concluded by settlement, consent judgment and permanent injunction;
- q. *Seiko Epson Corporation, et al. v. Glory South Software Manufacturing Inc., et al.*, Civil No. 06-236-BR (D. Or.), filed on February 17, 2006, concluded by default judgment and permanent injunction
- r. *Seiko Epson Corporation, et al. v. Glory South Software Manufacturing Inc., et al.*, Civil No. 06-477-BR (D. Or.), filed on April 7, 2006, concluded by default judgment and permanent injunction;
- s. *Seiko Epson Corporation, et al. v. Abacus 24-7 LLC, et al.*, Civil No. 09-477-BR (D. Or.), filed on April 28, 2009, concluded by settlement, consent judgment and permanent injunction;
- t. *Seiko Epson Corporation, et al. v. E-Babylon, Inc., et al.*, Civil No. 07-896-BR (D. Or.), filed on June 18, 2007, concluded by settlement, consent judgment and permanent injunction; and
- u. *Seiko Epson Corporation, et al. v. Inkjetmadness.com, Inc., et al.*, Civil No. 08-452-BR (D. Or.), filed on April 10, 2008, concluded by settlement, consent judgment and permanent injunction.

5. In addition, this action is related to *In the Matter of CERTAIN INK CARTRIDGES AND COMPONENTS THEREOF*, Investigation No. 337-TA-946, United States International Trade Commission, Washington, D.C., which was adjudicated by the ITC

in a final determination (Commission Opinion, May 26, 2016) (the "ITC 946 Investigation") and in which the Commission issued a General Exclusion Order and certain Cease and Desist Orders that include the '749 patent and the '116 patent. The '749 and '116 patents asserted in this case were litigated in the ITC 946 Investigation against the same or overlapping groups of aftermarket ink cartridges that are accused of infringement in this action.

6. Finally, this action is related to *In the Matter of CERTAIN INK CARTRIDGES AND COMPONENTS THEREOF*, Investigation No. 337-TA-565, United States International Trade Commission, Washington, D.C., which was adjudicated by the ITC in a final determination (Commission Opinion, Oct. 19, 2007) (the "ITC 565 Investigation") and in which the Commission issued a General Exclusion Order and certain Cease and Desist Orders that include the '422 patent. The '422 patent at issue in this case was litigated in the ITC 565 Investigation against the same or overlapping groups of aftermarket ink cartridges that are accused of infringement in this action.

THE PARTIES

7. Plaintiff Seiko Epson Corporation ("Seiko Epson") is a corporation organized and existing under the laws of Japan. Its principal place of business is located at 3-3-5 Owa Suwa-Shi Nagano-Ken, 392-8502, Japan. Seiko Epson is the assignee of the Epson Patents.

8. Plaintiff Epson America, Inc. ("Epson America") is a corporation organized and existing under the laws of the State of California. Its principal place of business is located at 3840 Kilroy Airport Way, Long Beach, California 90806. As the North American sales, marketing and customer service affiliate of Seiko Epson, Epson America is the

exclusive licensee of the Epson Patents for distributing in the United States Epson ink cartridges that embody the inventions contained in the Epson Patents, including cartridges manufactured by Epson Portland Inc.

9. Plaintiff Epson Portland Inc. ("Epson Portland is a corporation organized and existing under the laws of the State of Oregon. Its principal place of business is located at 3950 NE Aloclek Place, Hillsboro, Oregon 97124. Epson Portland is the exclusive licensee of the Epson Patents for manufacturing in the United States Epson ink cartridges that embody the inventions contained in the Epson Patents. Seiko Epson, Epson America and Epson Portland are sometimes referred to collectively herein as "Epson" or "Plaintiffs."

10. Plaintiffs produce and sell ink cartridges that operate with Epson ink jet printers utilizing Epson's patented technology and designs in the United States and in this judicial district.

11. On information and belief, and according to the North Carolina Department of State Division of Corporations, defendant BCH Technologies LLC ("BCH") is a limited liability company organized and existing under the laws of the State of North Carolina. Based on information and belief, and according to BCH's filings with the North Carolina Department of State Division of Corporations, BCH's registered agent is Kevin Day aka Wenjing Dai and BCH's principal office address and mailing address is 4925 West Market Street, Suite 1118, Greensboro, North Carolina 27407. Based on information and belief, and according to BCH's filings with the North Carolina Department of State Division of Corporations, BCH's company officials are Kevin Day and Lovelin Day. According to

BCH's website at bchtechnologies.com, Kevin Day is identified as the President of BCH, and the address of BCH's wholesale store is listed as 4925 West Market Street, Suite 1118, Greensboro, North Carolina 27407.

12. On information and belief defendant Kevin William Day, aka Wenjing Dai, is an individual who resides in North Carolina, and is the President and owner of BCH. On information and belief, and according to filings with the United States Patent and Trademark Office ("USPTO"), for the registration of the mark "BCH," (registration no. 4,161,179, registered June 19, 2012), Wenjing Dai aka Kevin Day is listed as the owner/applicant with an address of 4925 W. Market Street, Suite 1118, Greensboro, North Carolina 27407, and identifies its goods as "Filled ink cartridges; Ink cartridges for printers; Ink for multifunction electronic devices for use in copying, printing, scanning, video capture or transmitting documents and images; Ink jet cartridges; Ink jet printer ink; Printers' ink; Printers' pastes; Printing compositions; Printing ink; Printing inks." The correspondence information lists Kevin William Day, with the very same address as Wenjing Dai and BCH—namely 4925 West Market Street, Suite 1118, Greensboro, North Carolina 27407—and also lists the correspondent email as support@bchtechnologies.com. BCH's website also lists Kevin William Day as President of BCH Technologies, and the address of BCH Wholesale Store as 4925 West Market Street, Suite 1118, Greensboro, North Carolina 27407.

13. On information and belief, defendant Max Mart LLC ("Max Mart") is a limited liability company organized and existing under the laws of the State of North Carolina. Based on information and belief, and according to Max Mart's filings with the

North Carolina Department of State Division of Corporations, Max Mart's registered agent is Donald Button CPA PLLC with a registered office address at 2012-C New Garden Road, Greensboro, North Carolina, 27410. Based on information and belief, and according to Max Mart's filings with the North Carolina Department of State Division of Corporations, Max Mart's principal office address is 901 Norwalk Street, Suite G, Greensboro, North Carolina 27407. Based on information and belief, and according to Max Mart's filings with the North Carolina Department of State Division of Corporations, Max Mart's company managing member is listed as "Shengteng (Max) Hu," one of the defendants named in this suit as discussed below at paragraph 14. Shengteng Hu's address is listed as the same address as Max Mart, namely, 901 Norwalk Street, Suite G, Greensboro, North Carolina 27407. On information and belief, Shengteng Hu is an individual who resides in the state of North Carolina and is the managing member of Max Mart with an address at 901 Norwalk Street, Suite G, Greensboro, North Carolina 27407.

14. On information and belief, defendant Shengteng Hu is an individual who resides in the state of North Carolina and is the managing member of Max Mart with an address at 901 Norwalk Street, Suite G, Greensboro, North Carolina 27407, the same address as Max Mart's principal office.

15. Collectively, defendants BCH, Kevin Day, Max Mart, and Shengteng Hu are referred to herein as the "NC Defendants."

16. On information and belief, defendant Zhuhai Du Fu E-Commerce Co., Ltd., formerly known as Zhuhai Du Fu Printing Supplies Co., Ltd., is a Limited Liability

Company organized and existing under the laws of China, d/b/a Do-It Industrial Co., Ltd., aka Zhuhai Du Yi E-Commerce Co., Ltd. (collectively referred to as "Do-It Co"). Based on information and belief, and according to the Chinese Government's official database at gsxt.go.cn, Zhuhai Du Fu E-Commerce Co., Limited's shareholders are Wang Jixiang and Wang Zhidong. Wang Zhidong is also listed as the company's executive director and general manager, and the registered office address of Do-It Co is listed as 5th, 2nd, and 3rd Floor, No. 12, Pingdong 3rd Road, Nanping Science and Technology Industrial Park, Zhuhai City, China.

17. On information and belief, defendant Zhuhai Xiaohui E-Commerce Co. Ltd., ("ZXE Co.") is a China Limited Liability Company organized and existing under the laws of China. Based on information and belief, and according to the Chinese Government's official database at gsxt.go.cn, ZXE Co's sole shareholder is Wang Hui, and the company's manager is Wang Jixiang, the same Wang Jixiang who is a shareholder of Do-It Co. The company's supervisor is Wang Jieqing. And the registered office address is Room 502, Building 5, No. 12, Pingdong 3rd Road, Nanping Science and Technology Industrial Park, Xiangzhou District, Zhuhai City, China.

18. Collectively, Do-It Co. and ZXE Co. are referred to herein as the "Zhuhai Defendants."

19. Collectively, the Zhuhai Defendants and the NC Defendants are referred to herein as "Defendants."

20. On information and belief, Defendants are engaged in the importation into the United States, sale for importation into the United States, and sale within the United States after importation, of ink cartridges that infringe one or more of the Epson Patents.

21. On information and belief, Defendants act in concert with each other and with other entities and under fictitious business names to import, manufacture, distribute and sell ink cartridges that infringe the Epson Patents. On information and belief, Defendants are jointly and severally responsible for the infringements of the Epson Patents as they jointly operated and continue to jointly operate and manage the infringing enterprises, including Defendants, and related d/b/a entities, as a single enterprise by comingling resources, assets, operations, commercial activities, and they incur expenses and achieve profits jointly for the benefit of the combined enterprise, its owners and officers.

22. On information and belief, Do-It Co does business in the United States under the name "Do-It Industrial Company Limited" and has and continues to conduct business via the Internet by offering for sale and selling cartridges that infringe the Epson Patents under various seller names via its own websites, including but not limited to ebbo-world.com, freesub-world.com, ifreesub.com, fuzoo-world.com, ijetsir.com, ikong-world.com, jarbo-world.com, kipozi-world.com, usa-ebbo.com, usa-miroo.com, usa-officeworld.com, usa-osir.com, and zhdoit.com. On information and belief and according to the domain name registrations, the above thirteen websites are all owned by Wang Zhidong (Do-It Co's executive director and general manager) and list the same contact phone number +86.75581474539 (except for zhdoit.com, which lists a different phone number, namely

+86.1087128888, but still names Wang Zhidong as the website registrant contact). On information and belief, Do-It Co also offered for sale and sold cartridges that infringe the Epson Patents via GSKink.com, a website which was controlled by the Zhuhai Defendants.

23. On information and belief, Do-It Co also conducts business via the Internet by offering for sale and selling cartridges that infringe the Epson Patents via various storefronts on amazon.com, newegg.com, walmart.com, and alibaba.com under various seller names. For example, Do-It Co uses its alibaba.com store front "doit-cmy.en.alibaba.com," which identifies Do-It Co as the registered company name and same address as Do-It Co, namely 5th, 2nd, and 3rd Floor, No. 12, Pingdong 3rd Road, Nanping Science and Technology Industrial Park, Zhuhai City, China, to offer for sale and sell cartridges that infringe the Epson Patents under the Zhuhai Defendants' Office World brand. On information and belief, Do-It Co also has used the "flyma" seller name on walmart.com to sell Zhuhai Defendants' branded cartridges that infringe the Epson Patents. On information and belief, Do-It Co also has used the Office World storefront on newegg.com to sell Zhuhai Defendants' branded cartridges that infringe the Epson Patents. On information and belief, Do-It Co also has used at least the following seller names to sell Zhuhai Defendants' branded cartridges that infringe the Epson Patents via at least the following storefronts on amazon:

Seller Name	Brand(s)	URL
Ebbo	Ebbo	https://www.amazon.com/s?me=A1YQ7MJXJ90TPR
FreeSub	FreeSub	https://www.amazon.com/s?me=A2RXCK2N01JLJG
FUZOO	FUZOO	https://www.amazon.com/s?me=A1PAKP6QT7SKIE
ifreeMall	OfficeWorld	https://www.amazon.com/s?me=A1NKLKDMXSZ02A

IKONG	IKONG	https://www.amazon.com/s?me=A2CJVG42D06Z3F
JARBO	JARBO	https://www.amazon.com/s?me=A2SNSHA3VXKYU6
JetSir	JetSir	https://www.amazon.com/s?me=AGPQHDAZ979IW
OSIR	OSIR	https://www.amazon.com/s?me=A3TSBGI6Q2UJNS
Smartjet	MIROO	https://www.amazon.com/s?me=A5RGL9G6ZX15L

24. On information and belief, and according to filings with the United States Patent and Trademark Office, the Zhuhai Defendants applied for the registration of trademarks corresponding to the above nine Zhuhai Defendants' brands under which the Zhuhai Defendants sell cartridges that infringe the Epson Patents, as follows:

Trademark	U.S. Trademark Registration Nos.	Original Owner
Ebbo	4,963,801 & 5,423,441	Wang Zhidong
FreeSub	5,423,378	Wang Zhidong
Fuzoo	5,035,080 & 5,423,443	Wang Zhidong
IKONG	5,035,079 & 5,423,442	Wang Zhidong
Jarbo	4,988,072 & 5,428,049	Wang Zhidong
JetSir	5,170,761 & 5,423,379	Wang Zhidong
MIROO	4,982,075 & 5,423,382	Wang Zhidong
Office World	4,859,896 & 5,423,440	Wang Zhidong
OSIR	4,859,895 & 5,423,381	Wang Zhidong

On information and belief, and according to filings with the United States Patent and Trademark Office, all of the above trademarks were originally owned by Wang Zhidong (Do-It Co.'s majority shareholder, executive director, and general manager), and all registrations list the very same goods and services associated with the trademarks as: "Colorants for use in the manufacture of printing ink; Filled ink cartridges; Filled toner cartridges; Ink jet printer ink; Ink for multifunction electronic devices for use in copying, printing, scanning, video capture or transmitting documents and images; Marking ink for animals; Microencapsulated

fragrance inks for flexographic printing; Photocopier toner in cartridges; Primer oils for printing; Printers' pastes; Printing ink; Printing inks, coatings, pigments and dispersions for use in the graphic arts industry; Printing toner; Thermochromic printing inks; Toner; Toner cartridges, filled, for laser printers; Toner cartridges, filled, for printers and photocopiers; Filled ink jet cartridges."

25. On information and belief, in 2017, after Epson notified Amazon that infringing cartridges with the above nine brands were being sold via the Zhuhai Defendants' storefronts on amazon.com, the Zhuhai Defendants temporarily stopped selling infringing cartridges with the above nine brands on their storefronts on amazon.com, newegg.com, and walmart.com. On information and belief, shortly thereafter the Zhuhai Defendants began selling cartridges for use in Epson printers that infringe the Epson Patents under various new seller names and brands on amazon.com and newegg.com, in which the listings had images and listings that were similar to the original nine brands. On information and belief, Zhuhai Defendants eventually began selling infringing cartridges with the above nine brands again under various new seller names on amazon.com and newegg.com. On information and belief, the table below lists various additional new seller names, brands, and the url for their respective storefronts controlled by Zhuhai Defendants' on amazon.com and newegg.com.

Seller Name	Brand(s)	URL
fu32vnfg7	Pureink	https://www.amazon.com/s?me=A2K5I4NYCG6KYR
haj_usa	CMTOP	https://www.amazon.com/s?me=A13YQFFA0K5O5G
LYC_usa	Vividcolor	https://www.amazon.com/s?me=A1K5IZ2ZJI35DK
mipelo_usa	Oriki	https://www.amazon.com/s?me=AVWU2GEH7IW8A
QingLiu	Welpop,	https://www.amazon.com/s?me=A1IV9I1PT7EKNC

	Oriki, Pureink	
Wildyez	Wildyez	https://www.amazon.com/s?me=A2PSDP1OLH1J22
YELENG	GSK	https://www.amazon.com/s?me=A2FZWQQKCXL321
Ayiya	Oriki, Pureink	https://www.amazon.com/s?me=A1HSGDNKS5X1M0
Balabala0	FreeSub, Oriki, Ebbo, JetSir	https://www.amazon.com/s?me=A2O9QV72AOLL0H
BestInk	Miroo, Oriki	https://www.amazon.com/s?me=AJ6UUBZ4XPZ9E
HLINK	various	https://www.amazon.com/s?me=A3L3K8ORQ3AAOU
Linkinc	various	https://www.amazon.com/s?me=A33Y785HSOFKRT
Jarbo Store	Jarbo, Officeworld , IKONG	https://www.newegg.com/p/pl?N=1065725555

26. On information and belief and according to the Office World and Jarbo Stores storefronts on newegg.com, Defendants offer for sale and sell the Zhuhai Defendants' branded products, including but not limited to Jarbo, IKONG, OfficeWorld, Miroo, GSK, and Jetsir brands, that infringe the Epson Patents. On information and belief ZXE Co also sold and shipped Zhuhai Defendants' brand products that were fulfilled by Amazon from inventory controlled by Do-It Co. On information and belief, ZXE received payment for the sale of cartridges that infringe the Epson Patents via the GSKink.com website controlled by the Zhuhai Defendants. On information and belief, and according to filings with the United States Patent and Trademark Office, Wang Zhidong was the original owner of the trademark registration nos. 4,988,072 and 5,428,049 for the Jarbo marks assigned to ZXE on August 15, 2018.

27. On information and belief, BCH shipped GSK branded cartridges for the Zhuhai Defendants (identified above in paragraphs 16-17, 22-26) from BCH's address at 4925 West Market Street, Suite 1118, Greensboro, North Carolina 27407, for sales of GSK branded cartridges ordered from the Zhuhai Defendants' Office World storefront on newegg.com and from the Zhuhai Defendants' GSKink.com website. On information and belief, BCH also offers for sale and sells, via its website bchtechnologies.com, BCH branded refillable cartridges for use with Epson printers that infringe the Epson Patents as complained of herein. For example, in the screen capture below of BCH's listing on bchtechnologies.com, visited February 19, 2019, BCH offers for sale BCH branded infringing ink cartridges for Epson printers and describes the infringing ink cartridges as "Refillable Cartridges with Auto Reset Chips. Work with Epson printers by allowing adding ink in each cartridge," and lists "compatible printers" as Epson models: Expression Home: XP-200, XP-300, XP-310, XP-400; WorkForce: WF-2010, WF-2010W, WF-2510WF, WF-2520NF, WF-2530, WF-2530WF, WF-2540WF."

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[Home](#) / [Cartridge](#) / [For Epson: Refillable](#) / **Refillable Cartridge for Epson T200 (RC-EP-T200)**



More Views



Refillable Cartridge for Epson T200 (RC-EP-T200)

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Refillable Cartridges with Auto Reset Chips. Work with Epson printers by allowing adding ink in each cartridge. Auto Reset Chips (ARC) will reset ink levels automatically.

SKU: RC-EP-T200

Availability: **In stock**

Regular Price: ~~\$29.99~~

Special Price \$22.99

Qty: [Add to Cart](#)

[Add to Wishlist](#) [Add to Compare](#)

[Product Description](#) [Additional Information](#) [Tags \(0\)](#) [Reviews \(0\)](#) [Questions \(1\)](#)

Auto Reset Chips (ARC) will reset ink levels automatically.

- Save up to 95% of printing cost by refilling your cartridge
- Specially designed to fit OEM printers. High capacity cartridge.
- High quality cartridge produce superior image quality and unbeatable value.
- Easy to prime and refill. Just take off the refill plug and add ink. No need to remove the unit for refilling

Compatible printers

Epson models: Expression Home: XP-200, XP-300, XP-310, XP-400;
 WorkForce: WF-2010F, WF-2010W, WF-2510WF, WF-2520NF, WF-2530, WF-2530WF, WF-2540WF

28. On information and belief, Kevin Day directs and controls the activities of BCH, including but not limited to, offering for sale and selling, via the bchtechnologies.com website, BCH branded refillable cartridges for use with Epson printers that infringe the Epson Patents, and shipping GSK branded cartridges for the Zhuhai Defendants from BCH's address at 4925 West Market Street, Suite 1118, Greensboro, North Carolina 27407, for purchases of GSK branded cartridges ordered on newegg.com.

29. On information and belief, Max Mart sold and shipped Zhuhai Defendants' branded cartridges, including but not limited to ikong, jarbo, and officeworld brands, for the Zhuhai Defendants (identified below in paragraphs 16-17, 22-26) from Max Mart's address at

901 Norwalk Street, Suite G, Greensboro, North Carolina 27407, for purchases of Zhuhai Defendants' branded cartridges ordered from the Zhuhai Defendants' Jarbo Store storefront on newegg.com. For example, in the screen capture below of the Zhuhai Defendants' Jarbo Store storefront, visited January 13, 2019, the listing offers for sale Jarbo branded infringing ink cartridges for Epson printers and describes the infringing ink cartridges as "Epson 220XL Ink Cartridges, 3 Black Ink Cartridge High Yield" and Compatible for Epson Printers: "Epson All-in-One Machines; Workforce WF-2630, WF-2650, WF-2660, WF-2760, WF-2750, Expression Home XP-320, XP-420, and XP-424." The Jarbo branded cartridge that was ordered was shipped directly from Max Mart at its address at 901 Norwalk St., Ste. G, Greensboro, North Carolina 27407.

JARBO

epson 220XL ink cartridges, 3 Black Ink Cartridge High Yield

★ **FREE SHIPPING** ⓘ

Sold and Shipped by:

~~49.99~~
\$17.99
 Save: \$12.00 (40%)

1 **ADD TO CART**

ADD TO COMPARE PRICE ALERT
 ADD TO WISH LIST

ARE YOU AN E-BLAST INSIDER?
 Enter Email Address

PayPal
 Shop without revealing payment details. Secure shopping made faster. Check out with PayPal.

SPONSORED PRODUCTS

Xerox 108R0094 Solid Ink - 4 Sticks - Black
~~225.00~~
\$165.45

D-Link Mini HD Wi-Fi Camera 2-Pack - Cloud Recording - Night Vision...
~~599.99~~
\$89.99

D-Link DCS-936L HD 720p Day / Night Wi-Fi Security Camera
~~469.99~~
 (5) **\$34.99**

Be the first to review this product... **SHARE**

In stock. Ships from Hong Kong. Most customers receive within 3-10 days.

Sold and Shipped by Jarbo store

International Seller **First From ASIA**

- Bright clean chip
- Ink of great quality
- Refined structure
- Quality control

Overview Specifications Warranty & Returns Reviews

What's in the box: Three black 220 ink cartridges included.

100% Compatible for Printer Listed Below:

Please check printer model carefully to make sure that you are ordering the correct ink cart

Epson All-in-One Machines:
 Workforce WF-2630 Expression Home XP-320
 Workforce WF-2650 Expression Home XP-420
 Workforce WF-2660 Expression Home XP-424
 Workforce WF-2750
 Workforce WF-2760

30. On information and belief, Shengteng Hu directs and controls the activities of Max Mart, including but not limited to importing, selling, and shipping Zhuhai Defendants' branded cartridges, including but not limited to ikong, jarbo, and officeworld brands of cartridges, from Max Mart's address at 901 Norwalk Street, Suite G, Greensboro, North Carolina 27407, for purchases of Zhuhai Defendants' branded cartridges ordered on newegg.com.

31. On information and belief, Defendants import, offer for sale, and sell ink cartridges that infringe the Epson Patents complained of herein, including through their websites and online marketplace storefronts discussed above in paragraphs 16-17, 22-26. For example, in the screen capture below of the Zhuhai Defendants' listing on their amazon.com storefront "ifreemall," visited on January 28, 2017, the Zhuhai Defendants offered for sale officeworld branded infringing ink cartridges for Epson printers and describes the infringing ink cartridges as "Office World 3 Black Remanufactured Replacement for Epson Ink Cartridges 200XL, Compatible for Epson XP-410, XP-400, XP-300, XP-310, XP-200, WF-2540, WF-2530, WF-2520" Epson printers.



Office World 3 Black Remanufactured Replacement for Epson Ink Cartridges 200XL, Compatible for Epson XP-410 XP-400 XP-300 XP-310 XP-200 Wf-2540 Wf-2530 Wf-2520

by Office World
★★★★★ 587 customer reviews
16 answered questions

Price: \$49.00
Sale: \$7.99 & FREE Shipping on orders over \$49.
Details
You Save: \$2.01 (20%)

Only 9 left in stock.
Want it Monday, Jan. 30? Order within 2 hrs 41 mins and choose Two-Day Shipping at checkout. Details
Sold by ifreeMall and Fulfilled by Amazon. Gift-wrap available.

Size: 3 x Black

Share [Email] [Facebook] [Twitter] [Pinterest]

Qty: 1

Yes, I want FREE Two-Day Shipping with Amazon Prime

Add to Cart

or 1-Click Checkout

Buy now with 1-Click®

Ship to:

Brian Feitz- FOOTHILL RANCH

This is a gift

Add to List

As another example, in the screen capture below of the Zhuhai Defendants' listing on their amazon.com storefront "BESTINK," visited on March 26, 2018, the Zhuhai Defendants offered for sale Miroo branded infringing ink cartridges for Epson printers and describes the infringing ink cartridges as "MIROO Remanufactured 252XL High Capacity 5 Pack Ink Cartridge, Worked with Workforce WF3640, WF3620, WF3630, WF7610, WF7620, WF7110 Printer (2 Black 1 Cyan 1 Magenta 1 Yellow)."



MIROO Remanufactured 252XL High Capacity 5 Pack Ink Cartridge, Worked with Workforce Wf 3640 Wf 3620 Wf 3630 Wf 7610 Wf 7620 Wf 7110 Printer (2 Black 1 Cyan 1 Magenta 1 Yellow)
by MIROO

146 customer reviews Share

Size: 1 set+ 1 Black

1 set+ 1 Black Lowest offer for each

Refine by Clear all

Shipping

Free shipping

Condition

New

Price + Shippi...

\$12.77

& FREE Shipping on orders over \$25.00. Details + \$0.00 estimated tax

Condition (Learn more)

New

Delivery

FULFILLMENT BY AMAZON

• Back-ordered. Due in stock April 2 -- order now to reserve yours
• Shipping rates and return policy.

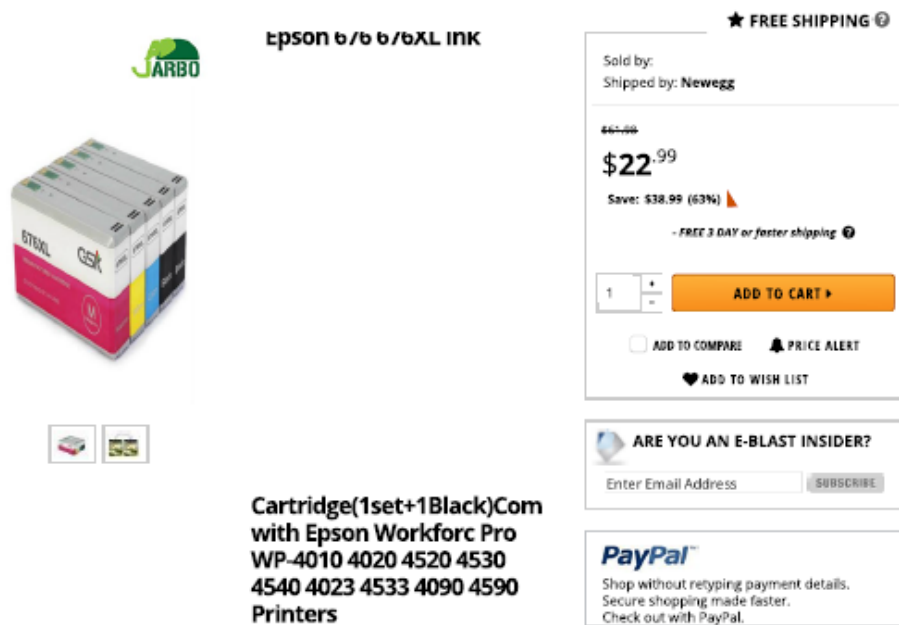
Seller Information

BESTINK 100% positive over the past 12 months. (1 total ratings)

Buying Options

Add to cart

As another example, in the screen capture below of one of the Zhuhai Defendants' listings on newegg.com, visited January 13, 2019, the Zhuhai Defendants offer for sale infringing ink cartridges for Epson printers and describes the infringing ink cartridges as "Epson 676, 676XL Ink, Cartridge (1set+1Black) Compatible with Epson Workforce Pro WF-4010, 4020, 4520, 4530, 4540, 4023, 4533, 4090, 4590 Printers."



On information and belief, most sales by Defendants are sold under their brand names identified above in paragraphs 16-17, 22-26, including but not limited to BCH, Ebbo, Freesub, Fuzoo, GSK, IKONG, Jarbo, Jetsir, Miroo, OfficeWorld, Okbili, Oriki, Osir, Pureink, Vivdcolor, and Welpop infringing ink cartridges.

32. Numerous purchases of infringing ink cartridges were made by Epson from Defendants' websites, Amazon, Newegg, Alibaba, and Walmart stores.

33. On September 6, 2019, the United States International Trade Commission ("ITC") issued a Seizure and Forfeiture Order in the 337-TA-565 ITC Investigation, discussed in paragraph 6 above, against Defendant, ordering that (emphasis added):

Ink Cartridges and Components Thereof that are imported in violation of the general exclusion order issued in the above-captioned investigation are to be seized and forfeited to the United States, if imported by the following firm: **Do-It Industrial Company Limited, Ella 12# PingDong 3 St., NanPing (sic) Industrial, Zhuhai, China 519060**, or any affiliated companies, parents, subsidiaries, or other related business entities, or any of their successors or assigns.

On information and belief, "Do-It Industrial Company Limited" referenced in the Seizure and Forfeiture Order is the same company as defendant Do-It Co named herein and that the address identified in the Seizure and Forfeiture Order is the same address for defendant Do-It Co in its listing on the Chinese Government's official database at gsxt.co.cn. The foregoing Seizure and Forfeiture Order, by its terms, was issued by the ITC after the United States Bureau of Customs and Border Protection ("Customs") had informed the ITC that defendant Do-It Co had attempted to import infringing ink cartridges covered by the 337-TA-565 General Exclusion Order and that Customs had denied such entry of infringing ink cartridges and informed defendant Do-It Co of the 337-TA-565 General Exclusion Order and also informed defendant Do-It Co that any further attempt to import infringing ink cartridges covered by the 337-TA-565 General Exclusion Order would result in seizure and forfeiture. On information and belief, despite Customs' notice and despite the ITC's Seizure and Forfeiture Order, and with full

knowledge of the same and of at least the '422 patent complained of herein (which is one of the patents covered by the 337-TA-565 General Exclusion Order) including knowledge of its infringement of at least the '422 patent, defendant Do-It Co imported infringing ink cartridges into the United States for sale on their own websites and online marketplace storefronts identified in paragraphs 16-17, 22-26 above, and elsewhere. For at least these reasons, and others, Defendant's importation, offers to sell, and sale of infringing ink cartridges complained of herein is willful. A copy of the ITC's Seizure and Forfeiture Order is attached hereto as Exhibit A.

JURISDICTION AND VENUE

34. The causes of action herein for patent infringement arise under the patent laws of the United States, 35 U.S.C. § 271. This Court has subject matter jurisdiction over the claims for patent infringement pursuant to 28 U.S.C. §§ 1331 and 1338(a). This Court has personal jurisdiction of the Defendants at least because Defendants have committed acts of direct and indirect patent infringement in this judicial district and reside in this judicial district. Venue is proper in this district under 28 U.S.C. §§ 1391(b), (c) and 1400(b).

FIRST CLAIM FOR RELIEF

(Patent Infringement—35 U.S.C. § 271)

INFRINGEMENT OF U.S. PATENT NO. 6,955,422

35. Epson incorporates by reference each and every allegation contained in Paragraphs 1 through 34 as though fully set forth at length here.

36. Epson owns all right, title, and interest in, including the right to sue thereon and the right to recover for infringement thereof, United States Patent No. 6,955,422, which was duly and legally issued to Seiko Epson by the United States Patent and Trademark Office on October 18, 2005. Attached as Exhibit B to this Complaint is a true and correct copy of the '422 patent. On September 29, 2009, reexamination certificate 6,955,422 C1 was duly and legally issued to Seiko Epson by the United States Patent and Trademark Office. Attached as Exhibit C to this Complaint is a true and correct copy of the reexamination certificate of the '422 patent. The original patent and the reexamination certificate are collectively referred to herein as "the '422 patent." The '422 patent relates generally to ink cartridges for printers.

37. The '422 patent is valid and enforceable.

38. On information and belief after conducting a reasonable investigation, Defendants have infringed and are infringing the '422 patent, as defined by numerous claims of the patent in violation of 35 U.S.C. § 271(a) by making, using, importing, offering to sell, and selling in this judicial district and elsewhere aftermarket ink cartridges that operate with Epson ink jet printers, including but not limited to ink cartridges having model nos. 78, 79, 126, 127, 200, 220, 252, and 288, as well as others that are no more than colorably different from the foregoing (collectively, the "Accused '422 Ink Cartridges"). The specific models of Accused '422 Ink Cartridges identified above were obtained by Epson during its investigation leading to this Complaint from Defendants' online listings on their websites and storefronts on Amazon.com and ebay.com.

39. As a non-limiting example, set forth below is a claim chart with a description of Defendants' infringement of exemplary claim 1 of the '422 patent by the Accused '422 Ink Cartridges. The infringement is shown using a representative ink cartridge (Model No. 126XL/T126120; Control No. 8246) from among the Accused '422 Ink Cartridges purchased from Defendants that, for infringement analysis purposes, is representative of and represents all of Defendants' ink cartridges within the Accused '422 Ink Cartridges (i.e., the represented ink cartridges), including, but not limited to, the models identified above. The claim chart below refers to this ink cartridge as "the Representative '422 Ink Cartridge." The Representative '422 Ink Cartridge was designed for use in a specific Epson printer, the Epson WF-3520 printer ("the Representative '422 Epson Printer"), and for purposes of the analysis set forth herein, the Representative '422 Ink Cartridge was tested in the Representative '422 Epson Printer, as discussed in further detail in the claim chart below.

Claim 1 of the '422 Patent	Where found in the Accused '422 Ink Cartridges
[1a] An ink cartridge detachably mountable on a carriage which is reciprocally movable in a recording apparatus and which has a plurality of electrodes, an engagement	Each of the Accused '422 Ink Cartridges is an ink cartridge for detachably mounting on the carriage of an Epson ink jet printer that is reciprocally movable in a recording apparatus (i.e., an ink jet printer). Defendants market and sell the Accused '422 Ink Cartridges as being compatible with one or more specific Epson ink jet printers. For example, the Representative '422 Ink Cartridge is compatible with the Representative '422 Epson Printer.

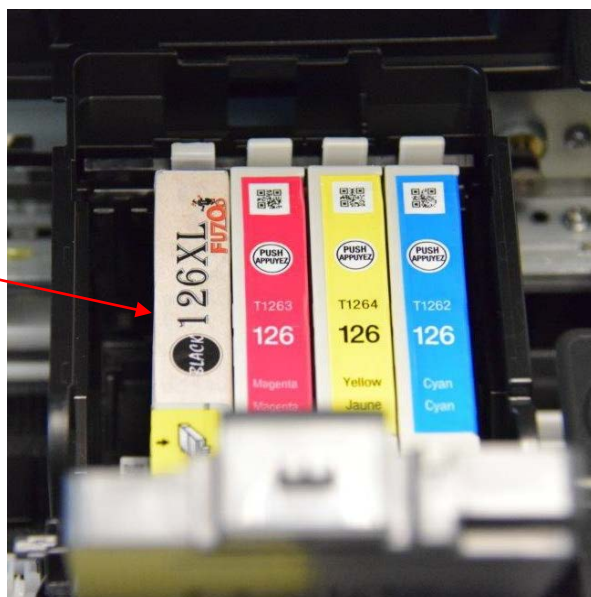
portion and an ink supply needle, the ink cartridge comprising:



an ink cartridge detachably mountable on a carriage of a recording apparatus (i.e., an ink jet

The following photograph depicts the Representative '422 Ink Cartridge detachably mounted in the carriage of the Representative '422 Epson Printer.

Representative '422 Ink Cartridge detachably mounted in the carriage of the Representative '422 Epson Printer

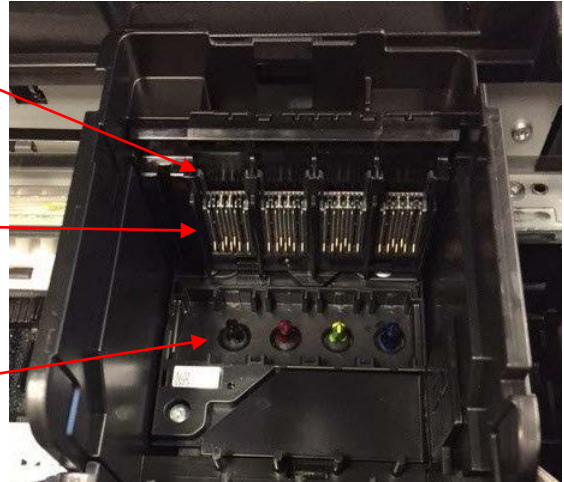


The reciprocally movable carriage in a recording apparatus (i.e., an ink jet printer) has a plurality of electrodes, an engagement portion and an ink supply needle. The following photograph shows the engagement portion, electrodes, and ink supply needle of the carriage of the Representative '422 Epson Printer.

Engagement portion
of the carriage of the
Representative '422
Epson Printer

Electrodes of the
carriage of the
Representative '422
Epson Printer

Ink supply needle of
the carriage of the
Representative '422
Epson Printer

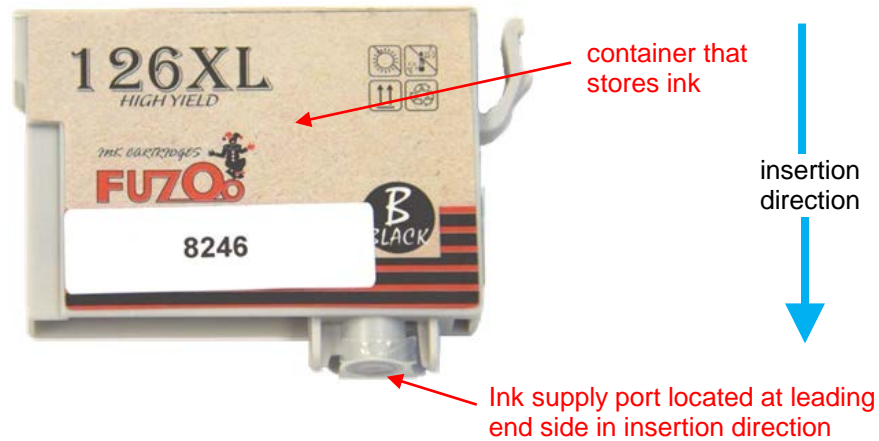


When mounted, each of the Accused '422 Ink Cartridges supplies ink to the printhead of the ink jet printer through an ink supply needle of the printer (the needle, which is part of the carriage inside the ink jet printer and not part of the cartridge, has a passage that allows ink to pass from the ink cartridge through the needle).

Accordingly, the Accused '422 Ink Cartridges literally meet the preamble of claim 1 of the '422 patent.

[1b] a container that stores ink therein and has an ink supply port connectable to the ink supply needle, the ink supply port being located in a leading end side in an insertion direction of the container into the carriage, the container further having first and second surfaces opposite each other, the first surface being substantially parallel to the insertion direction of the container into the carriage;

Each of the Accused '422 Ink Cartridges has a container that stores ink, an ink supply port that is connectable to the ink supply needle of the printer carriage, with the ink supply port located in a leading end side in an insertion direction of the container into the carriage. These features are shown below using the Representative '422 Ink Cartridge:



Each of the Accused '422 Ink Cartridges has a container that has a first and second surfaces opposite each other, the first surface being substantially parallel to the insertion direction of the container into the carriage. These features are shown below using the Representative '422 Ink Cartridge:



Accordingly, the Accused '422 Ink Cartridges literally meet this limitation of claim 1 of the '422 patent.

[1c] a memory device having a plurality of electrodes disposed substantially in a first plane for respective electrical connection to the electrodes of the carriage, the electrodes of the memory device being fixed relative to the first surface of the container; and

Each of the Accused '422 Ink Cartridges has a memory device having a plurality of electrodes that are disposed substantially in a first plane for respective electrical connection to the electrodes of the carriage, the electrodes of the memory device are fixed relative to the first surface of the container. These features are shown below using the Representative '422 Ink Cartridge:

gold colored electrodes are in the plane of the circuit board which itself is in a first plane

the electrodes are fixed relative to the first surface (i.e., the front surface of the container)



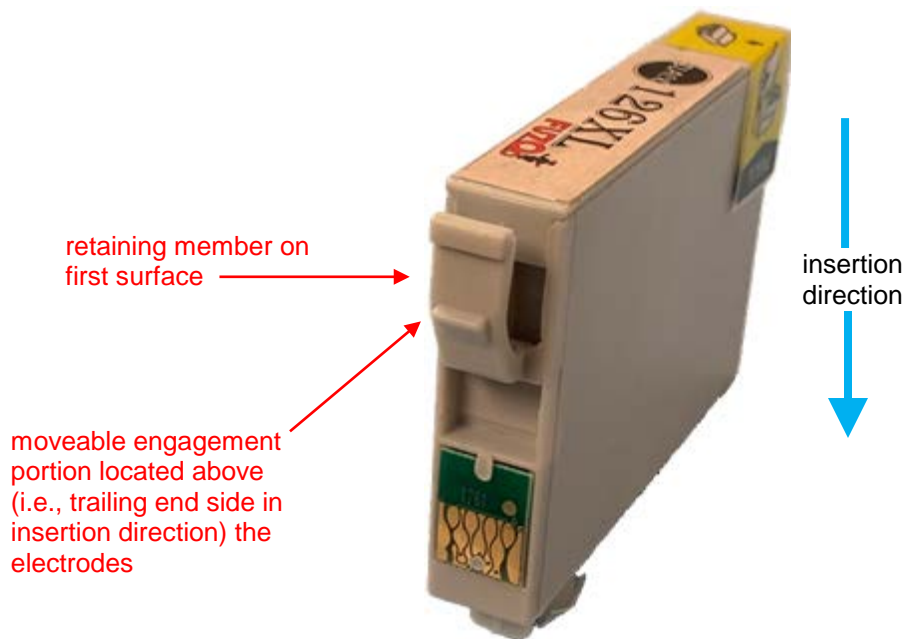
Memory devices is on the back of the green circuit board



Accordingly, the Accused '422 Ink Cartridges literally meet this limitation of claim 1 of the '422 patent.

[1d] a retaining member disposed on the first surface of the container, and having a movable engagement portion that can shift position relative to the first surface of the container and which is located at a trailing end side relative to the electrodes of the memory device in the insertion direction of the container into the carriage, and which is engageable with the engagement portion of the carriage,

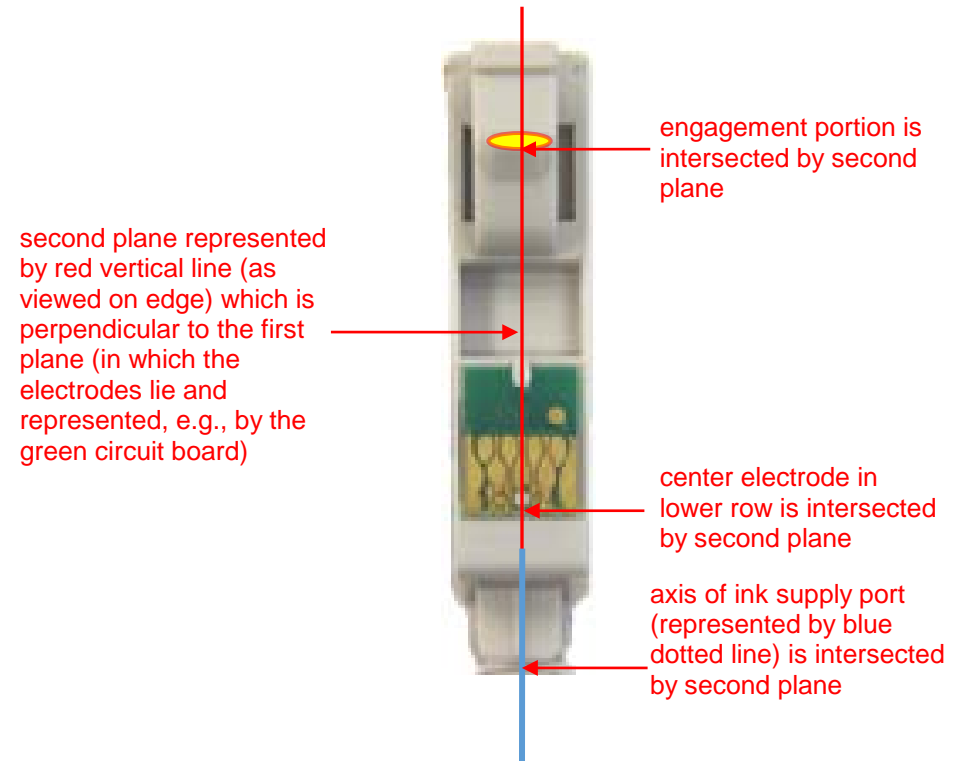
Each of the Accused '422 Ink Cartridges has a retaining member disposed on the first surface of the container, and has a movable engagement portion that can shift position relative to the first surface of the container. The movable engagement portion is located at a trailing end side relative to the electrodes of the memory device in the insertion direction of the container into the carriage. The movable engagement portion of the retaining member is engageable with the engagement portion of the carriage. These features are shown below using the Representative '422 Ink Cartridge:



Accordingly, the Accused '422 Ink Cartridges literally meet this limitation of claim 1 of the '422 patent.

[1e] wherein at least one said electrode, the movable engagement portion, and an axis of the ink supply port are intersected by a second plane that is perpendicular to the first plane.

In each of the Accused '422 Ink Cartridges at least one of the electrodes, the movable engagement portion, and the axis of the ink supply port are intersected by a second plane that is perpendicular to the first plane. These features are shown below using the Representative '422 Ink Cartridge:



Accordingly, the Accused '422 Ink Cartridges literally meet this limitation of claim 1 of the '422 patent.

40. On information and belief after conducting a reasonable investigation, Defendants have and are actively, knowingly and intentionally aiding and abetting and inducing infringement of the '422 patent in violation of 35 U.S.C. § 271(b) by non-parties, including end-users, despite Defendants' knowledge of the '422 patent. On information and belief, Defendant Kevin Day directs and controls the infringing activities of defendant BCH and has taken and continues to take active steps to encourage and induce BCH to infringe by

actively running and directing the businesses, including but not limited to being the principal decision maker regarding the promotion, advertising, and sale of products that infringe the '422 patent on Defendants' websites, amazon.com, newegg.com, and walmart.com discussed above in paragraphs 11-14, 16-17, and 20-33. On information and belief, Defendant Shengteng Hu directs and controls the infringing activities of defendant Max Mart and has taken and continues to take active steps to encourage and induce Max Mart to infringe by actively running and directing the businesses, including but not limited to being the principal decision maker regarding the promotion, advertising, and sale of products that infringe the '422 patent on Max Mart's storefronts on internet marketplaces, including amazon.com, newegg.com, and walmart.com discussed above in paragraphs 11-14, 16-17, and 20-33.

41. On information and belief, Defendants have had knowledge of the '422 patent prior to, or at least since the filing and service of this complaint on Defendants.

42. On information and belief, Defendants are contributing to the infringement of the '422 patent in violation of 35 U.S.C. § 271(c) by non-parties by offering to sell or selling within the United States or importing into the United States components of the patented inventions set forth in the '422 patent. The components constitute a material part of the inventions. Defendants know that such components are especially made or especially adapted for use in an infringement of the '422 patent. The components are not a staple article or commodity of commerce suitable for substantial noninfringing use.

43. By reason of Defendants' infringing activities, Epson has suffered, and will continue to suffer, substantial damages in an amount to be proven at trial.

44. Defendants' acts complained of herein have damaged and will continue to damage Epson irreparably. Epson has no adequate remedy at law for these wrongs and injuries. Epson is therefore entitled to a preliminary and permanent injunction restraining and enjoining Defendants and their agents, servants, and employees, and all persons acting thereunder, in concert with, or on their behalf, from infringing the claims of the '422 patent.

45. Defendants are not licensed or otherwise authorized to make, use, import, sell, or offer to sell any ink cartridge claimed in the '422 patent, and Defendants' conduct is, in every instance, without Epson's consent.

46. On information and belief, Defendants' infringement has been and continues to be willful.

SECOND CLAIM FOR RELIEF

(Patent Infringement—35 U.S.C. § 271)

INFRINGEMENT OF U.S. PATENT NO. 8,794,749

47. Epson incorporates by reference each and every allegation contained in Paragraphs 1 through 34 as though fully set forth at length here.

48. Epson owns all right, title, and interest in, including the right to sue thereon and the right to recover for infringement thereof, United States Patent No. 8,794,749 ("the '749 patent"), which was duly and legally issued to Seiko Epson by the United States Patent and Trademark Office on August 5, 2014. The '749 patent relates generally to ink cartridges for printers. Attached as Exhibit D to this Complaint is a true and correct copy of the '749 patent.

49. The '749 patent is valid and enforceable.

50. On information and belief after conducting a reasonable investigation, Defendants have infringed and are infringing the '749 patent, as defined by numerous claims of the patent in violation of 35 U.S.C. § 271(a) by making, using, importing, offering to sell, and selling in this judicial district and elsewhere aftermarket ink cartridges that operate with Epson ink jet printers, including but not limited to ink cartridges having model nos. 78, 79, 98, 126, 127, 200, 220, 252, 273, 288, 410, 676, and 786, as well as others that are no more than colorably different from the foregoing (collectively, the "Accused '749 Ink Cartridges"). The specific models of Accused '749 Ink Cartridges identified above were obtained by Epson during its investigation leading to this Complaint from Defendants' online listings on their websites and storefronts on Amazon.com and eBay.com.

51. As a non-limiting example, set forth below is a claim chart with a description of Defendants' infringement of exemplary claim 1 of the '749 patent by the Accused '749 Ink Cartridges. The infringement is shown using a representative ink cartridge (Model No. 200XL/T200XL120; Control No. 8274) from among the Accused '749 Ink Cartridges purchased from Defendants that, for infringement analysis purposes, is representative of and represents all of Defendants' ink cartridges within the Accused '749 Ink Cartridges (i.e., the represented ink cartridges), including, but not limited to, the models identified above. The claim chart below refers to this ink cartridge as "the Representative '749 Ink Cartridge." The Representative '749 Ink Cartridge was designed for use in a specific Epson printer, the Epson WorkForce WF-2540 printer ("the Representative '749 Epson Printer"), and for purposes of

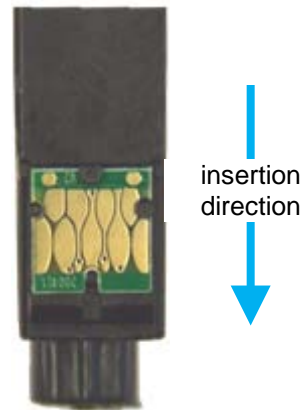
the analysis set forth herein, the Representative '749 Ink Cartridge was tested in the Representative '749 Epson Printer, as discussed in further detail in the claim chart below.

Claim 1 of the '749 Patent	Where found in the Accused '749 Ink Cartridges
<p>[1a] A printing material container adapted to be attached to a printing apparatus by being inserted into the printing apparatus in an insertion direction, the printing apparatus having a print head and a plurality of apparatus-side electrical contact members, the printing material container comprising:</p>	<p>Each of the Accused '749 Ink Cartridges is a printing material container (an ink cartridge) adapted to be attached to an Epson ink jet printing apparatus. Each of the Accused '749 Ink Cartridges is inserted, in an insertion direction, into an Epson ink jet printer. All Epson ink jet printers that accept the Accused '749 Ink Cartridges have a print head and a plurality of printer-side (apparatus-side) electrical contact members.</p> <p>These features are shown below using the Representative '749 Ink Cartridge.</p> <p>The Representative '749 Ink Cartridge is adapted to be attached to the Representative '749 Epson Printer by being inserted in an insertion direction, as shown in the following photographs:</p>  <p>The Representative '749 Ink Cartridge</p>



The Representative '749 Epson Printer

The following photograph depicts the insertion direction (blue arrow) in which the Representative '749 Ink Cartridge is inserted into the Representative '749 Epson Printer:



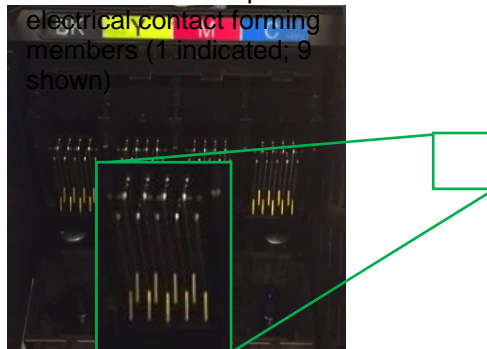
The following photograph shows the Representative '749 Ink Cartridge, a black-ink ink cartridge, attached in the Representative '749 Epson Printer after the cartridge has been inserted into the printer in the insertion direction (the yellow, magenta, and cyan ink cartridges, which are genuine Epson ink cartridges used to fill the remaining slots of the cartridge holder, can also be seen):

Representative '749 Ink Cartridge installed in the Representative '749 Epson Printer



The Epson ink jet printers that accept the Accused '749 Ink Cartridges each include a print head for printing and multiple printer-side electrical contact forming members for each ink cartridge accepted by the printer. These features are shown below for the printer's cartridge holder slot that accepts the Representative '749 Ink Cartridge, a black-ink ink cartridge (the printer's electrical contact members for the yellow, magenta, and cyan cartridges can also be seen in the right photo):

zoomed-in view of printer's electrical contact forming members (1 indicated; 9 shown)



Accordingly, the Accused '749 Ink Cartridges literally meet the preamble of claim 1 of the '749 patent.

[1b] an ink supply opening, having an exit, adapted to supply ink from the ink cartridge to the printing apparatus;

Each of the Accused '749 Ink Cartridges comprises an ink supply opening having an exit. When attached, the ink supply opening of each of the Accused '749 Ink Cartridges is adapted to supply ink from the cartridge to the Epson ink jet printer that accepts the cartridge. The following photograph depicts the exit of the ink supply opening of the Representative '749 Ink Cartridge:

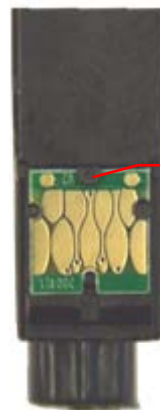


exit of ink supply opening

Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.

[1c] a low voltage electronic device adapted to receive and function with a low voltage, the low voltage electronic device comprising a memory device;

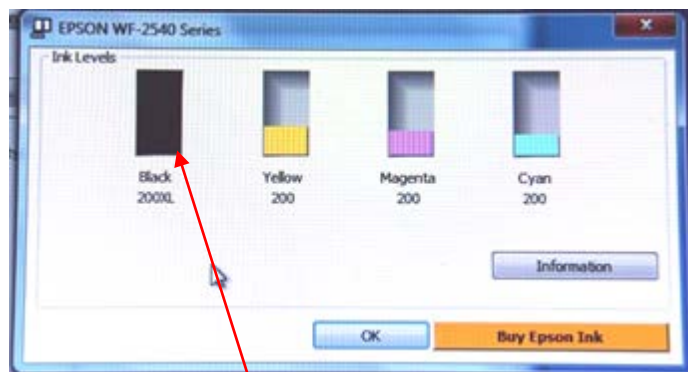
Each of the Accused '749 Ink Cartridges comprises a low voltage electronic device that comprises a memory device adapted to receive and function with a low voltage. The low voltage electronic device is an integrated circuit ("IC") chip located on the back of a printed circuit board that is mounted on a wall of the ink cartridge, as shown below in the Representative '749 Ink Cartridge:



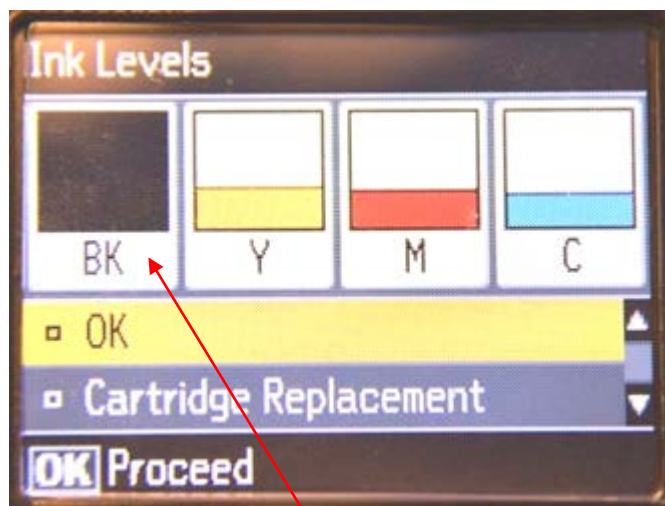
printed circuit board (green) with low voltage electronic device located on back

In addition, the presence of a low voltage electronic device (i.e., an IC chip comprising a memory device) is further confirmed through testing demonstrating that

the Epson ink jet printers that accept the Accused '749 Ink Cartridges read the remaining ink level and other descriptive information about the ink cartridge from the ink cartridge's memory device, and display that information on the display screen of a connected computer and on the printer's display screen. The following photographs show the display of such information on the computer display screen and the printer's display screen for the Representative '749 Ink Cartridge, containing black ink, attached to the Representative '749 Epson Printer:

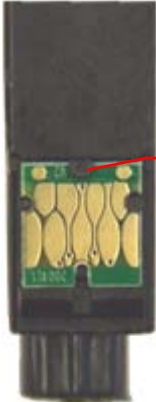


memory device shows, on the computer's display screen, the amount of black ink remaining in the Representative '749 Ink Cartridge



memory device shows, on the printer's display screen, the amount of black ink remaining in the Representative '749 Ink Cartridge

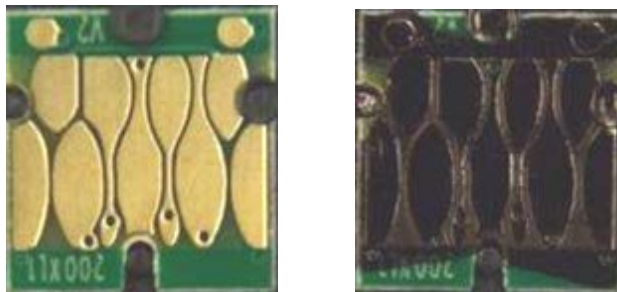
	<p>All Epson ink jet printers that accept the Accused '749 Ink Cartridges have similar circuitry and programming in terms of the voltages and signals they apply to their contact forming members and, consequently, to the corresponding contact portions of the Accused '749 Ink Cartridges (the contact portions are located on the gold-colored metallic terminals of the ink cartridge shown above). In particular, Epson printers apply a maximum voltage of approximately 4 volts (a low voltage as compared to the high voltage discussed in the next limitation) to certain of their contact forming members that in turn correspond to certain of the contact portions of the Accused '749 Ink Cartridges that are connected to the low voltage electronic device comprising a memory device. Consequently, the low voltage electronic device is adapted to receive and function with a low voltage.</p> <p>Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.</p>
<p>[1d] a high voltage electronic device adapted to receive and function with a high voltage, which is a higher voltage than the low voltage of the low voltage electronic device; and</p>	<p>Each of the Accused '749 Ink Cartridges comprises a high voltage electronic device that is adapted to receive and function with a voltage that is a higher voltage than the voltage of the low voltage electronic device. The high voltage electronic device may be, for example, a resistor, or one or more other coupled electronic components, that is/are capable of receiving and functioning with a high voltage. The high voltage electronic device is located on the back of a printed circuit board that is mounted on a wall of the ink cartridge, as shown below in the Representative '749 Ink Cartridge:</p>

	 <p>printed circuit board (green) with high voltage electronic device located on back</p> <p>All Epson ink jet printers that accept the Accused '749 Ink Cartridges have similar circuitry and programming in terms of the voltages and signals they apply to their contact forming members and, consequently, to the corresponding contact portions of the Accused '749 Ink Cartridges (the contact portions are located on the gold terminals of the ink cartridge shown above). In particular, Epson printers apply a voltage of approximately 42 volts (a high voltage as compared to the low voltage of approximately 4 volts applied to the low voltage electronic device discussed in the preceding limitation) to two of their contact forming members that in turn correspond to two of the contact portions of the Accused '749 Ink Cartridges that are connected to the high voltage electronic device. Consequently, the high voltage electronic device is adapted to receive and function with a high voltage.</p> <p>Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.</p>
<p>[1e] a plurality of container-side terminals having contact portions adapted and positioned to contact corresponding apparatus-side contact forming members so that electrical communication is enabled between the container and the printing apparatus, the contact</p>	<p>Each of the Accused '749 Ink Cartridges comprises a plurality of container-side terminals that have contact portions. The contact portions are adapted and positioned on the cartridge so that, when the cartridge is attached to the printer, the contact portions of the cartridge's terminals contact corresponding printer-side contact forming members so that electrical communication is enabled between the cartridge and</p>

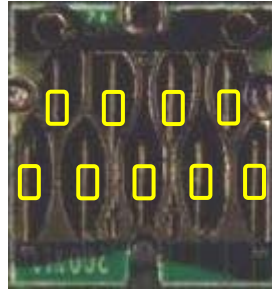
portions of the terminals including a plurality of low voltage electronic device contact portions electrically coupled to the low voltage electronic device, and a first high voltage electronic device contact portion and a second high voltage electronic device contact portion, each electrically coupled to the high voltage electronic device, wherein:

the printer.

As seen with respect to limitation 1c above, the terminals of the Accused '749 Ink Cartridges are the gold colored metallic portions on the green printed circuit board. The contact portions are located on these gold colored metallic portions. To confirm the location and arrangement of the terminals' contact portions, the terminals were marked with black ink, the cartridge was installed in and then removed from the printer (which caused the printers' contact forming members to leave scratch marks on the terminals thereby removing a portion of the black ink that was applied and therefore indicating the location of the contact portions), and the terminals were then photographed. For example, the terminals of the Representative '749 Ink Cartridge before marking with black ink is shown on the left and after marking with black ink is shown on the right:

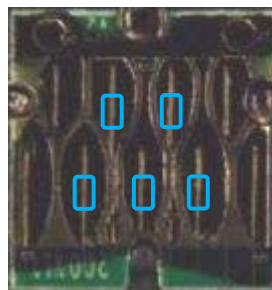


The resulting marks left by the printer's contact forming members on the terminals show the location and arrangement of the contact portions. These are indicated below with annotated yellow boxes superimposed on the terminals to indicate the location of the contact portions (there are a total of nine contact portions, with four contact portions in a top row and five contact portions in a bottom row):

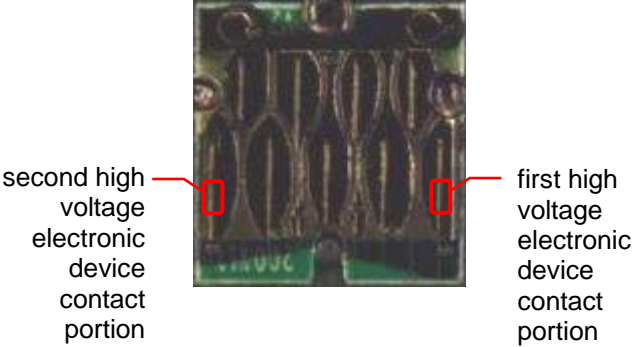


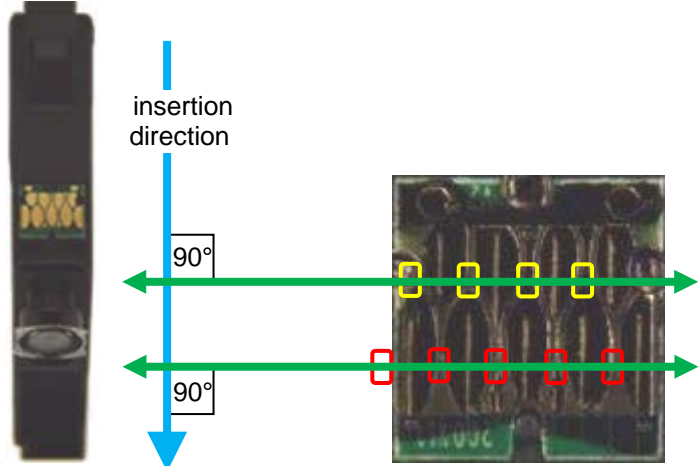
The contact portions shown above correspond to their printer-side contact forming members so that electrical communication is enabled between the ink cartridge and the printer, e.g., so the printer can read remaining ink level and other information from the memory device as described above with respect to limitation 1c.

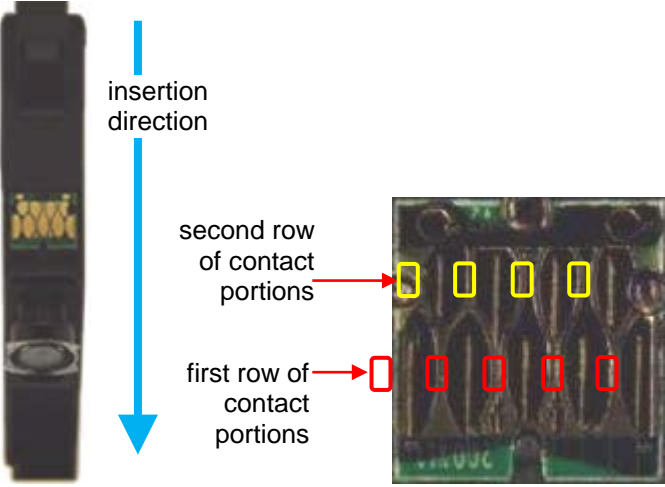
The above shown contact portions include a plurality of low voltage electronic device contact portions that are electrically coupled to the low voltage electronic device (specifically, the IC chip comprising a memory device). Each low voltage electronic device contact portion is electrically coupled by the terminal it appears on and by other circuitry to the memory device located on the back of the green printed circuit board. The following photograph of the Representative '749 Ink Cartridge shows the low voltage electronic device contact portions (there are five such low voltage electronic device contact portions, as indicated by superimposed blue boxes):

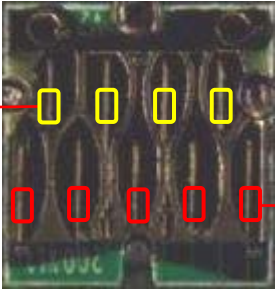


The contact portions of the Accused '749 Ink Cartridges' terminals also include first and second high

	<p>voltage electronic device contact portions that are each electrically coupled to the high voltage electronic device discussed above with respect to limitation 1d. Each high voltage electronic device contact portion is electrically coupled by the terminal it appears on and by other circuitry to the high voltage electronic device on the back of the printed circuit board. The following photograph of the Representative '749 Ink Cartridge shows the high voltage electronic device contact portions (there are two such high voltage electronic device contact portions, as indicated by superimposed red boxes):</p> <div style="text-align: center;">  </div> <p>Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.</p>
<p>[1f] the contact portions are arranged in a first row of contact portions and in a second row of contact portions, the first row of contact portions and the second row of contact portions extending in a row direction which is generally orthogonal to the insertion direction,</p>	<p>The contact portions of each of the Accused '749 Ink Cartridges are arranged in a first row of contact portions and in a second row of contact portions that both extend in a row direction which is generally orthogonal to the insertion direction. The following photographs of the Representative '749 Ink Cartridge show the first row and second row of contact portions extending in a row direction which is generally orthogonal to the insertion direction in which the Accused '749 Ink Cartridges are inserted into Epson ink jet printers that accept the Accused '749 Ink Cartridges. The right photo shows an enlarged and annotated view of the printed circuit board shown in the left photo.</p>

	 <p>first row of contact portions (red squares) and second row of contact portions (yellow squares), each extending in a row direction (green arrows) orthogonal to cartridge insertion direction (blue arrow)</p> <p>Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.</p>
<p>[1g] the first row of contact portions is disposed at a location that is further in the insertion direction than the second row of contact portions, and,</p>	<p>In each of the Accused '749 Ink Cartridges, the first row of contact portions is disposed at a location that is further in the insertion direction than the second row of contact portions. The following photographs of the Representative '749 Ink Cartridge show the first row of contact portions (red boxes) disposed at a location that is further in the cartridge insertion direction than the second row of contact portions (yellow boxes) (i.e., the first row is deeper in the printer than the second row).</p>

	 <p data-bbox="769 783 1382 869">first row of contact portions (red squares) disposed further in insertion direction (blue arrow) than second row of contact portions (yellow squares)</p> <p data-bbox="696 905 1430 974">Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.</p>
<p data-bbox="188 1016 662 1499">[1h] the first row of contact portions has a first end position and a second end position at opposite ends thereof, the first high voltage electronic device contact portion is disposed at the first end position of the first row of contact portions and the second high voltage electronic device contact portion is disposed at the second end position of the first row of contact portions.</p>	<p data-bbox="696 1016 1430 1331">In each of the Accused '749 Ink Cartridges, the first row of contact portions has a first end position and a second end position at opposite ends thereof, the first high voltage electronic device contact portion is disposed at the first end position of the first row of contact portions, and the second high voltage electronic device contact portion is disposed at the second end position of the first row of contact portions.</p> <p data-bbox="696 1381 1430 1577">The following photograph of the Representative '749 Ink Cartridge shows the first and second high voltage contact portions disposed, respectively, at the first and second end positions at opposite ends of the first row of contact portions.</p>

	<div style="display: flex; align-items: center; justify-content: space-between;"> <div style="width: 30%;"> <p>second high voltage electronic device contact portion disposed at second end position of first row of contact portions</p> </div> <div style="width: 30%; text-align: center;">  </div> <div style="width: 30%;"> <p>first high voltage electronic device contact portion disposed at first end position of first row of contact portions</p> </div> </div> <p>Accordingly, the Accused '749 Ink Cartridges literally meet this limitation of claim 1 of the '749 patent.</p>
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52. On information and belief, Defendants have and are actively, knowingly and intentionally aiding and abetting and inducing infringement of the '749 patent by non-parties in violation of 35 U.S.C. § 271(b), including end-users, despite Defendants' knowledge of the '749 patent.

53. On information and belief after conducting a reasonable investigation, Defendants have and are actively, knowingly and intentionally aiding and abetting and inducing infringement of the '749 patent in violation of 35 U.S.C. § 271(b) by non-parties, including end-users, despite Defendants' knowledge of the '749 patent. On information and belief, Defendant Kevin Day directs and controls the infringing activities of defendant BCH and has taken and continues to take active steps to encourage and induce BCH to infringe by actively running and directing the businesses, including but not limited to being the principal decision maker regarding the promotion, advertising, and sale of products that infringe the '749 patent on Defendants' websites, amazon.com, newegg.com, and walmart.com discussed above in paragraphs 11-14, 16-17, and 20-33. On information and belief, Defendant

Shengteng Hu directs and controls the infringing activities of defendant Max Mart and has taken and continues to take active steps to encourage and induce Max Mart to infringe by actively running and directing the businesses, including but not limited to being the principal decision maker regarding the promotion, advertising, and sale of products that infringe the '749 patent on Max Mart's storefronts on internet marketplaces, including amazon.com, newegg.com, and walmart.com discussed above in paragraphs 11-14, 16-17, and 20-33.

54. On information and belief, Defendants have had knowledge of the '749 patent prior to, or at least since the filing and service of this complaint on Defendants.

55. On information and belief, Defendants are contributing to the infringement of the '749 patent in violation of 35 U.S.C. § 271(c) by non-parties by offering to sell or selling within the United States or importing into the United States components of the patented inventions set forth in the '749 patent. The components constitute a material part of the inventions. Defendants know that such components are especially made or especially adapted for use in an infringement of the '749 patent. The components are not a staple article or commodity of commerce suitable for substantial noninfringing use.

56. By reason of Defendants' infringing activities, Epson has suffered, and will continue to suffer, substantial damages in an amount to be proven at trial.

57. Defendants' acts complained of herein have damaged and will continue to damage Epson irreparably. Epson has no adequate remedy at law for these wrongs and injuries. Epson is therefore entitled to a preliminary and permanent injunction restraining and enjoining Defendants and their agents, servants, and employees, and all persons acting

thereunder, in concert with, or on their behalf, from infringing the claims of the '749 patent.

58. Defendants are not licensed or otherwise authorized to make, use, import, sell, or offer to sell any ink cartridge claimed in the '749 patent, and Defendants' conduct is, in every instance, without Epson's consent.

59. On information and belief, Defendants' infringement has been and continues to be willful.

THIRD CLAIM FOR RELIEF

(Patent Infringement—35 U.S.C. § 271)

INFRINGEMENT OF U.S. PATENT NO. 8,454,116

60. Epson incorporates by reference each and every allegation contained in Paragraphs 1 through 34 as though fully set forth at length here.

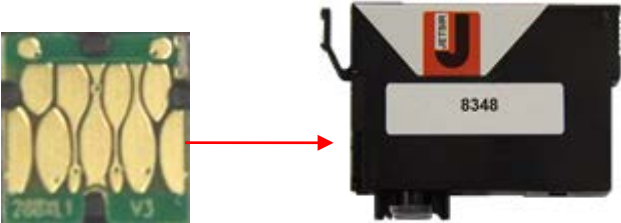
61. Epson owns all right, title, and interest in, including the right to sue thereon and the right to recover for infringement thereof, United States Patent No. 8,454,116 ("the '116 patent"), which was duly and legally issued to Seiko Epson by the United States Patent and Trademark Office on June 4, 2013. The '116 patent relates generally to ink cartridges for printers. Attached as Exhibit E to this Complaint is a true and correct copy of the '116 patent.

62. The '116 patent is valid and enforceable.

63. On information and belief after conducting a reasonable investigation, Defendants have infringed and are infringing the '116 patent, as defined by at least one claim of the patent in violation of 35 U.S.C. § 271(a) by making, using, importing, offering to sell, and selling in this judicial district and elsewhere aftermarket ink cartridges that operate with

Epson ink jet printers, including but not limited to replacement cartridge chips and ink cartridges having model nos. 78, 79, 98, 200, 220, 252, 273, 288, 410, 676, and 786, as well as others that are no more than colorably different from the foregoing (collectively, the "Accused '116 Ink Cartridges"). The specific models of Accused '116 Ink Cartridges and replacement cartridge chips identified above were obtained by Epson during its investigation leading to this Complaint from Defendants' online listings on their websites, and storefronts on Amazon.com and eBay.com.

64. As a non-limiting example, set forth below is a claim chart with a description of Defendants' infringement of claim 18 of the '116 patent by the Accused '116 Ink Cartridges. The infringement is shown using a representative ink cartridge (Model No. 288XL/T288XL120; Control No. 8348) from among the Accused '116 Ink Cartridges purchased from Defendants that, for infringement analysis purposes, is representative of and represents all of Defendants' ink cartridges within the Accused '116 Ink Cartridges (i.e., the represented ink cartridges), including, but not limited to, the models identified above. The claim chart below refers to this ink cartridge as "the Representative '116 Ink Cartridge." The Representative '116 Ink Cartridge was designed for use in a specific Epson printer, the Epson WorkForce WF-2540 printer ("the Representative '116 Epson Printer"), and for purposes of the analysis set forth herein, the Representative '116 Ink Cartridge was tested in the Representative '116 Epson Printer, as discussed in further detail in the claim chart below.

Claim 18 of the '116 patent	Where found in the Accused '116 Ink Cartridges
<p>[18a]. A circuit board mountable on a printing material container that is used in an ink jet printing apparatus, the ink jet printing apparatus having a print head and a plurality of apparatus-side contact forming members, the printing material container having a body and an ink supply opening, the ink supply opening having an exit on an exterior portion of the body and being adapted to supply ink from the printing material container to the printing apparatus, the circuit board comprising:</p>	<p>A circuit board is mounted on the Representative '116 Ink Cartridge (model no. 288XL; control no. 8348), which itself is a printing material container and that is used in an Epson ink jet printing apparatus (e.g., the Representative '116 Epson Printer) having a print head and a plurality of apparatus-side contact forming members.</p> <p>The Representative '116 Ink Cartridge has a body and an ink supply opening having an exit on an exterior portion of the body and being adapted to supply ink from the Representative '116 Ink Cartridge to the Epson ink jet printing apparatus.</p> <p>The Representative '116 Ink Cartridge is a printing material container with a mounted circuit board.</p> <p>The following photos depict the circuit board (green with gold-colored metallic terminals) mounted on the Representative '116 Ink Cartridge containing black ink.</p>  <p>The Representative '116 Ink Cartridge is used in any of the following Epson ink jet printer (printing apparatus) models: Epson Expression Home XP-330, XP-340, XP-430, XP-434, XP-440, and XP-446 (the "Epson Ink Jet Printers").</p> <p>The following photo depicts the Epson WorkForce WF-2540 ink jet printer.</p>



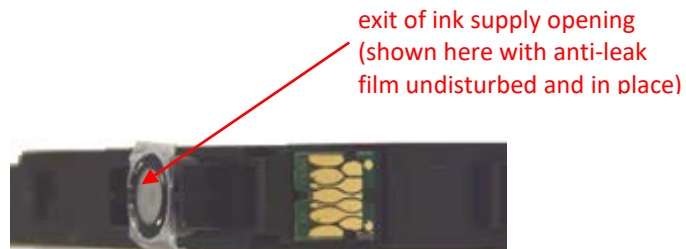
The Epson Ink Jet Printers each include a print head for printing and multiple printer-side contact forming members.

The Representative '116 Ink Cartridge has a body, as depicted below.



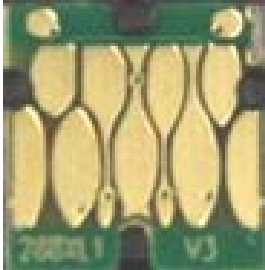
The Representative '116 Ink Cartridge has an ink supply opening having an exit on an exterior portion of the body. When mounted, the ink supply opening is adapted to supply ink from the printing material container (i.e., the cartridge) to the Epson Ink Jet Printers.

The following photo depicts the exit of the Representative '116 Ink Cartridge's ink supply opening.

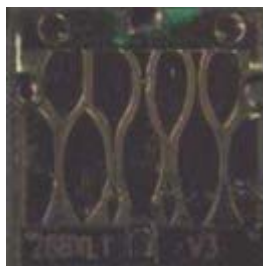


	<p>Accordingly, the Representative '116 Ink Cartridge literally meets the preamble of claim 18 of the '116 patent.</p>
<p>[18b] a memory device adapted to be driven by a memory driving voltage;</p>	<p>The circuit board mounted on the Representative '116 Ink Cartridge comprises a memory device that is adapted to be driven by a memory driving voltage.</p> <p>The following photo depicts the circuit board (green with gold-colored metallic terminals) mounted on the Representative '116 Ink Cartridge. The memory device is located on the back of the circuit board and is not visible in this view.</p> <div data-bbox="808 905 1396 1318" data-label="Image"> </div> <p>All Epson ink jet printers that accept the Representative '116 Ink Cartridge have similar circuitry and programming in terms of the voltages and signals they apply to their contact forming members and, consequently, to the corresponding contact portions of the Representative '116 Ink Cartridge (the contact portions are located on the gold-colored metallic terminals of the ink cartridge shown above). In particular, Epson printers apply a maximum voltage of approximately 4 volts (a low voltage as compared to the high voltage discussed in the next limitation) to certain of their</p>

	<p>contact forming members that in turn correspond to certain of the contact portions of the Representative '116 Ink Cartridge that are connected to the memory. Consequently, the memory device is adapted to be driven by a memory driving voltage. This was confirmed through testing during the ITC 946 Investigation.</p> <p>Accordingly, the Representative '116 Ink Cartridge literally meets this limitation of claim 18 of the '116 patent.</p>
<p>[18c] an electronic device adapted to receive a voltage higher than the memory driving voltage; and</p>	<p>The circuit board mounted on the Representative '116 Ink Cartridge comprises an electronic device that is adapted to receive a voltage that is a higher voltage than the voltage of the memory device. The electronic device that receives a higher voltage may be, for example, a resistor, or one or more other coupled electronic components, that is/are capable of receiving a high voltage. The electronic device is located on the back of a printed circuit board that is mounted on a wall of the Representative '116 Ink Cartridge shown in the above limitation.</p> <p>Moreover, all Epson ink jet printers that accept the Representative '116 Ink Cartridge have similar circuitry and programming in terms of the voltages and signals they apply to their contact forming members and, consequently, to the corresponding contact portions of the circuit board mounted on the Representative '116 Ink Cartridge (the contact portions are located on the gold terminals of circuit board mounted on the ink cartridge shown above).</p> <p>In particular, Epson printers apply a voltage of approximately 42 volts (a high voltage as compared to the low voltage of approximately 4 volts applied to the memory device discussed in the preceding limitation) to two of their contact forming members that in turn correspond to two of</p>

	<p>the contact portions of the circuit board mounted on the Representative '116 Ink Cartridge that are connected to the electronic device. Consequently, the electronic device is adapted to receive and function with a high voltage. This was confirmed through testing during the ITC 946 Investigation.</p> <p>Accordingly, the Representative '116 Ink Cartridge literally meets this limitation of claim 18 of the '116 patent.</p>
<p>[18d] a plurality of terminals having contact portions adapted and positioned to contact corresponding apparatus-side contact forming members so that electrical communication is enabled with the ink jet printing apparatus, the contact portions of the terminals including a plurality of memory contact portions electrically coupled to the memory device, a first electronic device contact portion electrically coupled to the electronic device, a second electronic device contact portion electrically coupled to the electronic device, and a short detection contact portion positioned and arranged to electrically contact a contact forming member that itself is electrically coupled to a short detection circuit of the printing apparatus, wherein:</p>	<p>The circuit board mounted on the Representative '116 Ink Cartridge comprises a plurality of terminals that have contact portions. The contact portions are adapted and positioned on the cartridge so that, when the cartridge is mounted on the printer, the contact portions of the cartridge's terminals contact corresponding printer-side contact forming members so that electrical communication is enabled with the printer.</p> <p>As discussed at 18(a) and 18(b) <i>supra</i>, the terminals of the Representative '116 Ink Cartridge's circuit board are the gold colored metallic portions on the green circuit board, reproduced in enlarged form below.</p>  <p>To determine the precise location of the terminals' contact portions, the following steps were taken: (1) using a marker, black ink was applied to the terminals and the terminal arrangement photographed; (2) the Representative '116 Ink</p>

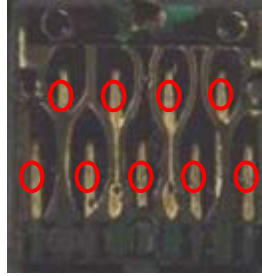
Cartridge was installed in and removed from the printer; and (3) the terminal arrangement was photographed. The following photo shows the terminals after the application of black ink with a marker.



The step of installing and removing the cartridge from the printer, causes the printer's contact forming members (discussed at 18(a), *supra*) to leave scratch marks on the terminals thereby removing a portion of the black ink that was applied with the marker. The following photo shows the terminals after the cartridge was installed and removed from the printer.

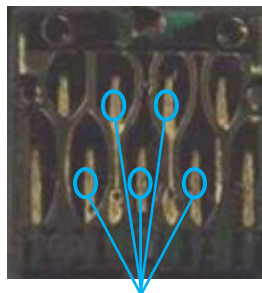


The contact portions of the circuit board's terminals are the most pronounced portions of the scratch marks (all of which contact corresponding printer-side contact forming members so that electrical communication is enabled with the printer, e.g., so that the printer can read remaining ink level and other information from the memory device as described in 18(b), *supra*). The following annotated photo shows the location of the contact portions annotated by red circles.



The contact portions of the circuit board's terminals include a plurality of memory contact portions that are electrically coupled to the memory device. Each memory contact portion is electrically coupled by the terminal it appears on to a "via," which is a through-hole (through the circuit board) that electrically couples the terminal to wiring on the back of the circuit board. The wiring on the back of the circuit board electrically couples the via (and, therefore, the contact portion of the terminal) to an electrical lead of the IC chip containing the memory device mounted on the back of the circuit board. In combination, these components electrically couple the memory contact portion to the memory device.

The following annotated photo depicts the five memory contact portions (in blue) located on the terminals on the front of the circuit board.

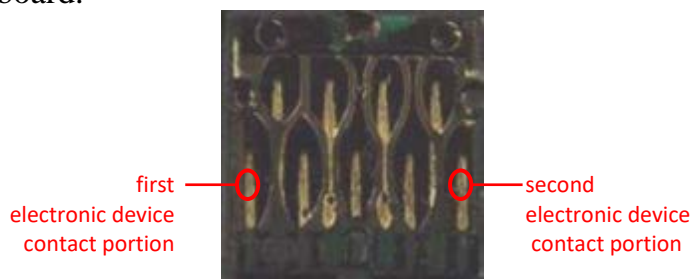


memory contact portions

The contact portions of the circuit board's terminals include a first and second electronic device contact portion that are each electrically coupled to the electronic device (specifically, the

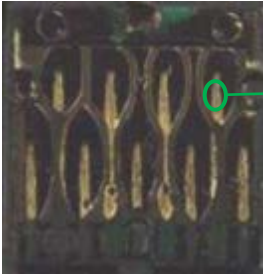
resistor). Each electronic device contact portion is electrically coupled by the terminal it appears on to a via that electrically couples the terminal to wiring located on the back of the circuit board. The wiring on the back of the circuit board electrically couples the via (and, therefore, the contact portion of the terminal) to an electrical lead of the resistor mounted on the back of the circuit board. In combination, these components electrically couple the first and second electronic device contact portions to the resistor.

The following annotated photo depicts the first and second electronic device contact portions (in red) located on the terminals on the front of the circuit board.



The contact portions of the circuit board's terminals include a short detection contact portion that is positioned and arranged to electrically contact a contact forming member of the Epson Ink Jet Printers that is itself electrically coupled to a short detection circuit of the printers.

The following photo depicts the short detection contact portion (in green).

	 <p>short detection contact portion</p> <p>Moreover, all Epson ink jet printers that accept the Representative '116 Ink Cartridge have similar circuitry and programming in terms of the operation of the short detection contact portion. In particular, when the printers are operated while the short detection contact portion is electrically shorted to the second electronic device contact portion, the printers stop the receipt of the voltage higher than the memory driving voltage by the second electronic device contact portion, and display an error message to the user on the display screen of a connected computer and on the printer display screen (if the printer has a display screen). This was confirmed through testing during the ITC 946 Investigation.</p> <p>Accordingly, the Representative '116 Ink Cartridge literally meets this limitation of claim 18 of the '116 patent.</p>
<p>[18e] the contact portions are arranged so that, when the terminal arrangement is viewed from the vantage of the contact forming members, with the terminals oriented as if in contact with the contact forming members so that electrical communication is enabled with the ink jet printing apparatus, and with the ink cartridge oriented with the exit of the ink supply</p>	<p>The contact portions of the Representative '116 Ink Cartridge's circuit board are arranged so that, when the terminal arrangement is viewed from the vantage of the printer's contact forming members, with the terminals oriented as if in contact with the contact forming members so that electrical communication is enabled with the printer, and with the ink cartridge oriented so that the exit of the ink supply opening faces downwards, then the contact portion farthest to the left is the first electronic device contact portion, the contact portion that is farthest to the right is the second</p>

opening facing downwards, the contact portion farthest to the left is the first electronic device contact portion, the contact portion that is farthest to the right is the second electronic device contact portion, the contact portion that is second farthest to the right is the short detection contact portion, and the memory contact portions are located to the left of the short detection contact portion and to the right of the first electronic device contact portion.

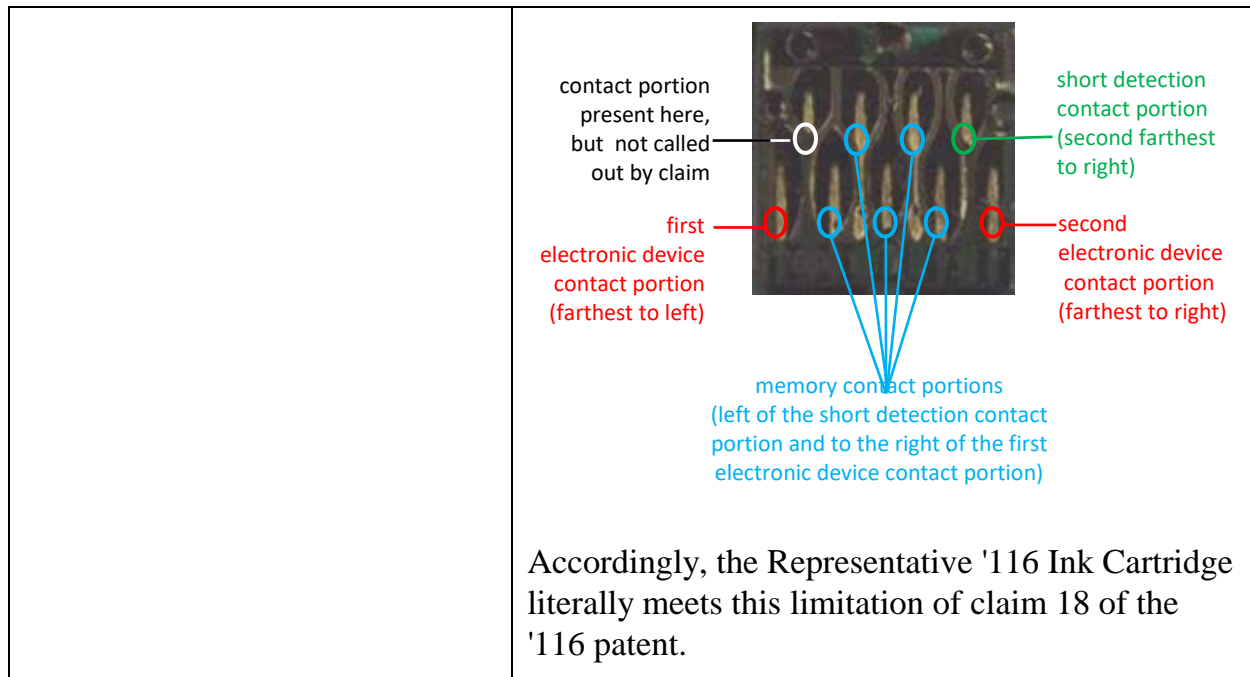
electronic device contact portion, the contact portion that is second farthest to the right is a short detection contact portion, and the memory contact portions are located to the left of the short detection contact portion and to the right of the first electronic device contact portion.

The following photo depicts the terminal arrangement when it is viewed from the vantage of the printer's contact forming members, with the terminals oriented as if in contact with the contact forming members so that electrical communication is enabled with the printer, and with the ink cartridge oriented so that the exit of the ink supply opening faces downwards.



terminal arrangement viewed from vantage of printer's contact forming members . . . with the exit of the ink supply opening facing downwards

The following photo depicts the arrangement of the contact portions when the terminal arrangement is viewed as described above.



65. On information and belief, Defendants have and are actively, knowingly and intentionally aiding and abetting and inducing infringement of the '116 patent by non-parties in violation of 35 U.S.C. § 271(b), including end-users, despite Defendants' knowledge of the '116 patent.

66. On information and belief after conducting a reasonable investigation, Defendants have and are actively, knowingly and intentionally aiding and abetting and inducing infringement of the '116 patent in violation of 35 U.S.C. § 271(b) by non-parties, including end-users, despite Defendants' knowledge of the '116 patent. On information and belief, Defendant Kevin Day directs and controls the infringing activities of defendant BCH and has taken and continues to take active steps to encourage and induce BCH to infringe by actively running and directing the businesses, including but not limited to being the principal

decision maker regarding the promotion, advertising, and sale of products that infringe the '116 patent on Defendants' websites, amazon.com, newegg.com, and walmart.com discussed above in paragraphs 11-14, 16-17, and 20-33. On information and belief, Defendant Shengteng Hu directs and controls the infringing activities of defendant Max Mart and has taken and continues to take active steps to encourage and induce Max Mart to infringe by actively running and directing the businesses, including but not limited to being the principal decision maker regarding the promotion, advertising, and sale of products that infringe the '116 patent on Max Mart's storefronts on internet marketplaces, including amazon.com, newegg.com, and walmart.com discussed above in paragraphs 11-14, 16-17, and 20-33.

67. On information and belief, Defendants are contributing to the infringement of the '116 patent in violation of 35 U.S.C. § 271(c) by non-parties by offering to sell or selling within the United States or importing into the United States components of the patented inventions set forth in the '116 patent. The components constitute a material part of the inventions. Defendants know that such components are especially made or especially adapted for use in an infringement of the '116 patent. The components are not a staple article or commodity of commerce suitable for substantial noninfringing use.

68. By reason of Defendants' infringing activities, Epson has suffered, and will continue to suffer, substantial damages in an amount to be proven at trial.

69. Defendants' acts complained of herein have damaged and will continue to damage Epson irreparably. Epson has no adequate remedy at law for these wrongs and injuries. Epson is therefore entitled to a preliminary and permanent injunction restraining

and enjoining Defendants and their agents, servants, and employees, and all persons acting thereunder, in concert with, or on their behalf, from infringing the claims of the '116 patent.

70. Defendants are not licensed or otherwise authorized to make, use, import, sell, or offer to sell any ink cartridge components claimed in the '116 patent, and Defendants' conduct is, in every instance, without Epson's consent.

71. On information and belief, Defendants' infringement has been and continues to be willful.

PRAYER FOR RELIEF

WHEREFORE, Epson prays for judgment against Defendants as follows:

- A. That the Epson Patents are valid and enforceable;
- B. That Defendants have infringed and are infringing the Epson Patents;
- C. That such infringement is willful;
- D. That Defendants and their subsidiaries, affiliates, parents, successors, assigns, officers, agents, representatives, servants, and employees, and all persons in active concert or participation with them, be preliminarily and permanently enjoined from continued infringement of the Epson Patents;
- E. That Defendants be ordered to pay Epson its damages caused by Defendants' infringement of the Epson Patents and that such damages be trebled, together with interest thereon;
- F. That this case be declared exceptional pursuant to 35 U.S.C. § 285 and that Epson be awarded its reasonable attorneys' fees, litigation expenses and expert witness fees,

and costs; and

G. That Epson have such other and further relief as the Court deems just and proper.

JURY TRIAL DEMAND

Pursuant to Fed. R. Civ. P. 38(b), Plaintiffs request a trial by jury of all issues so triable.

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