

1 VENABLE LLP  
2 Sarah S. Brooks (SBN 266292)  
3 ssbrooks@venable.com  
4 2049 Century Park East, Suite 2300  
5 Los Angeles, CA 90067  
6 Telephone: (310) 229-9900  
7 Facsimile: (310) 229-9901

8 *Attorneys for Plaintiff Canon Inc.*

9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11 CANON INC., a Japanese corporation,  
12 Plaintiff,

13 v.

14 NINESTAR TECHNOLOGY  
15 COMPANY, LTD., a New Jersey  
16 corporation; NINESTAR  
17 CORPORATION, a Chinese corporation;  
18 and NINESTAR IMAGE TECH  
19 LIMITED, a Hong Kong corporation,  
20 Defendants.

Case No. 2:20-cv-8498

**PLAINTIFF CANON INC.'S  
COMPLAINT FOR PATENT  
INFRINGEMENT**

**JURY TRIAL DEMANDED**

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1 Plaintiff Canon Inc. (“Canon”) brings this action for patent infringement  
2 against Defendants Ninestar Technology Company, Ltd.; Ninestar Corporation;  
3 and Ninestar Image Tech Limited (collectively, “Defendants”), and alleges as  
4 follows:

5 **The Parties**

6 1. Canon is a corporation organized and existing under the laws of  
7 Japan, having its principal place of business at 30-2, Shimomaruko 3-chome, Ohta-  
8 ku, Tokyo 146-8501, Japan.

9 2. Canon is a leading innovator, manufacturer, and seller of a wide  
10 variety of laser beam printers, inkjet printers, copying machines, cameras, and  
11 other consumer, business, and industrial products.

12 3. On information and belief, Ninestar Technology Company, Ltd.  
13 (“Ninestar Tech”) is a corporation organized and existing under the laws of the  
14 State of New Jersey, with its principal place of business located at 17950 East Ajax  
15 Circle, City of Industry, California 91748, and another place of business located at  
16 13875 Ramona Ave., Chino, California 91710.

17 4. On information and belief, Ninestar Tech conducts activities via the  
18 Internet at least through its website *ninestartechonline.com*.

19 5. On information and belief, Ninestar Corporation is an entity registered  
20 in China, with its principal place of business located at No. 3883, Zhuhai Avenue,  
21 Xiangzhou District, Zhuhai, Guangdong, China 519060.

22 6. On information and belief, Ninestar Corporation conducts activities  
23 via the Internet at least through its website *ninestargroup.com* and through the  
24 websites of the other Defendants.

25 7. On information and belief, Ninestar Image Tech Limited (“Ninestar  
26 Image”) is an entity registered in Hong Kong, with a registered address of 9/F Unit  
27 18, New Commerce Center, No. 9 On Lai Street, Shatin, Hong Kong, S.A.R., and  
28 with its principal place of business located at No. 3883, Zhuhai Avenue,

1 Xiangzhou District, Zhuhai, Guangdong, China 519060.

2 8. On information and belief, Ninestar Image conducts activities via the  
3 Internet at least through its websites *ggimage.com* and *ninestarimage.com*.

4 9. On information and belief, Ninestar Tech, Ninestar Corporation, and  
5 Ninestar Image are all related companies, under common ownership and control,  
6 and part of a common enterprise known as “Ninestar” or “G&G.”

7 **Jurisdiction and Venue**

8 10. This is an action for patent infringement arising under the patent laws  
9 of the United States, Title 35 of the United States Code. This Court has subject  
10 matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).

11 11. This Court has personal jurisdiction over Ninestar Tech because its  
12 principal place of business is located in this judicial district, and over all  
13 Defendants because each has, directly or through intermediaries, committed acts  
14 within California giving rise to this action and/or has established minimum  
15 contacts with California such that the exercise of jurisdiction would not offend  
16 traditional notions of fair play and substantial justice.

17 12. Venue with respect to Ninestar Tech is proper under 28 U.S.C.  
18 § 1400(b) because it has committed infringing acts in this judicial district and has a  
19 regular and established place of business in this judicial district.

20 13. Venue with respect to Ninestar Corporation and Ninestar Image is  
21 proper under 28 U.S.C. §§ 1391(b) and (c) because they do not reside in the United  
22 States and therefore may be sued in any judicial district where they are subject to  
23 the court’s personal jurisdiction, including here in this judicial district.

24 **Canon’s Patents-in-Suit**

25 14. On December 26, 2017, U.S. Patent No. 9,851,688 (the “’688  
26 patent”), titled “Electrophotographic Image Forming Apparatus, Developing  
27 Apparatus, and Coupling Member,” duly and legally issued to Canon as assignee  
28 of the inventors, Masanari Morioka, Shigeo Miyabe, and Takahito Ueno. A true

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1 and correct copy of the '688 patent is attached as Exhibit 1.

2 15. On January 2, 2018, U.S. Patent No. 9,857,766 (the "'766 patent"),  
3 titled "Electrophotographic Image Forming Apparatus, Developing Apparatus, and  
4 Coupling Member," duly and legally issued to Canon as assignee of the inventors,  
5 Masanari Morioka, Shigeo Miyabe, and Takahito Ueno. A true and correct copy  
6 of the '766 patent is attached as Exhibit 2.

7 16. On April 14, 2020, U.S. Patent No. 10,620,582 (the "'582 patent"),  
8 titled "Electrophotographic Image Forming Apparatus, Developing Apparatus, and  
9 Coupling Member," duly and legally issued to Canon as assignee of the inventors,  
10 Masanari Morioka, Shigeo Miyabe, and Takahito Ueno. A true and correct copy  
11 of the '582 patent is attached as Exhibit 3.

12 17. On July 14, 2020, U.S. Patent No. 10,712,709 (the "'709 patent"),  
13 titled "Electrophotographic Image Forming Apparatus, Developing Apparatus, and  
14 Coupling Member," duly and legally issued to Canon as assignee of the inventors,  
15 Masanari Morioka, Shigeo Miyabe, and Takahito Ueno. A true and correct copy  
16 of the '709 patent is attached as Exhibit 4.

17 18. On July 14, 2020, U.S. Patent No. 10,712,710 (the "'710 patent"),  
18 titled "Electrophotographic Image Forming Apparatus, Developing Apparatus, and  
19 Coupling Member," duly and legally issued to Canon as assignee of the inventors,  
20 Masanari Morioka, Shigeo Miyabe, and Takahito Ueno. A true and correct copy  
21 of the '710 patent is attached as Exhibit 5.

22 19. Canon is the sole owner of the entire right, title, and interest in and to  
23 the '688, '766, '582, '709, and '710 patents (collectively, "Asserted Patents"),  
24 including the right to sue and recover for any and all infringements thereof.

25 20. The Asserted Patents are valid and enforceable.

26 **Defendants' Infringing Activities**

27 21. On information and belief, Defendants are engaged in the business of  
28 manufacturing, using, selling, and/or offering to sell in the United States and/or

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1 importing into the United States toner cartridges (hereafter, “Accused Products”)  
2 for printers, including toner cartridges for use in certain Canon and HP color laser  
3 beam printers, including but not limited to the following printers: Canon i-  
4 SENSYS LBP7010C, Canon i-SENSYS LBP7018C, HP LaserJet Pro 100 MFP  
5 M175nw, HP LaserJet Pro CP 1025, HP LaserJet Pro CP 1025nw, HP TopShot  
6 LaserJet Pro M275 MFP, HP Color LaserJet Pro MFP M176, HP Color LaserJet  
7 Pro MFP M176n, HP Color LaserJet Pro MFP M176fn, HP Color LaserJet Pro  
8 MFP M177, and HP Color LaserJet Pro MFP M177fw.

9 22. Non-limiting examples of Accused Products sold by Defendants that  
10 infringe the Asserted Patents include those bearing the designations 126A, HP  
11 126A, CE310A, CE311A, CE312A, CE313A, NHCE310A, NHCE311A,  
12 NHCE312A, NHCE313A, 130A, HP 130A, CF350A, CF351A, CF352A, CF353A,  
13 NHCF350A, NHCF351A, NHCF352A, and NHCF353A.

14 23. On information and belief, Defendants offer to sell and sell the  
15 Accused Products within this judicial district and elsewhere, including through  
16 Ninestar websites, such as *ninestartechonline.com*, *ninestarimage.com*,  
17 *ninestargroup.com*, and/or *ggimage.com*.

18 24. On information and belief, Defendants have substantial affiliations  
19 with one another and are individually and collectively responsible and accountable  
20 for the manufacture, use, sale, and/or offer for sale in the United States and/or  
21 importation into the United States of Accused Products.

22 25. On information and belief, Ninestar Corporation is the ultimate parent  
23 company of, and exercises full control over, Ninestar Image and Ninestar Tech.

24 26. According to the website *ninestarimage.com*, Ninestar Corporation  
25 develops, manufactures, and sells toner cartridges, and “has established branches,  
26 warehouses and logistics platforms in Holland, USA, Italy, Malaysia and Japan.”  
27 Ex. 6.

28 27. The website *ninestarimage.com* further describes Ninestar Image as

1 “a sub-company of Ninestar Corporation,” and Ninestar Tech as “the United States  
2 branch” of Ninestar Image. Ex. 6; Ex. 7.

3 28. The website *ninestartechonline.com* describes Ninestar Tech as a  
4 “global leading supplier of consumer imaging supplies” and a “wholesale  
5 distributor” of Ninestar imaging products to Ninestar Technology registered  
6 resellers. Ex. 8.

7 29. The common enterprise of Ninestar is further evidenced by Ninestar  
8 Corporation and Ninestar Image sharing the same physical address in Zhuhai,  
9 China.

10 30. The Accused Products often are sold in packaging having one or more  
11 distinctive features that identify Ninestar as the source of the Accused Products.

12 31. For example, Defendants often include on the packaging of their toner  
13 cartridges an image of three penguins. An example of this can be seen in the  
14 below image obtained from *ninestarimage.com*. Ex. 9.



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1 32. Shown below is a photograph of the packaging of an exemplary  
2 Accused Product, which includes the same image of three penguins.



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10 33. As another example, on information and belief, Ninestar Corporation  
11 has been certified by the International Imaging Technology Council as a  
12 Standardized Test Methods Committee (“STMC”) Compliant Company and has  
13 been issued Certification No. 8105. Defendants often include on the packaging of  
14 their toner cartridges an STMC logo with Certification No. 8105 to identify  
15 Defendants as the source of those toner cartridges.

16 34. Shown below is a photograph of a portion of the packaging of an  
17 exemplary Accused Product, which bears the STMC logo with Certification No.  
18 8105.



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1                    **First Cause of Action: Infringement of U.S. Patent No. 9,851,688**

2                    35. Canon repeats and incorporates by reference the allegations of  
3 paragraphs 1-34 above, as though set forth here in their entirety.

4                    36. Defendants have directly infringed and are directly infringing the '688  
5 patent by making, using, selling, and/or offering to sell in the United States and/or  
6 importing into the United States toner cartridges embodying the invention defined  
7 by one or more claims of the '688 patent, including without limitation the Accused  
8 Products, without authority or license of Canon. More particularly, Defendants'  
9 manufacture, use, sale, and/or offer for sale in the United States and/or importation  
10 into the United States of at least the Accused Products infringes at least claims 1,  
11 4-8, 10, 13-17, 19, 21, 22, and 24-27 of the '688 patent.

12                    37. Defendants also are indirectly infringing the '688 patent at least by  
13 virtue of their inducement of direct infringement of that patent by customers who  
14 use Defendants' Accused Products in at least the Canon and HP laser beam printers  
15 listed above. At the very latest, Defendants will be given notice of their  
16 infringement of the '688 patent upon being served with or otherwise receiving this  
17 Complaint. On information and belief, Defendants knowingly induce customers to  
18 use their Accused Products, including, for example, by promoting them for use in  
19 specific printers and/or providing customers with instructions for using them in  
20 those printers.

21                    38. The following paragraphs 42-85 show how Defendants' model  
22 NHCE310A toner cartridge, which is an example of an Accused Product, infringes  
23 independent claims 1, 10, 19, and 24 of the '688 patent.

24                    39. Upon information and belief, the exemplary model NHCE310A toner  
25 cartridge shown herein is substantially the same as the other Accused Products in  
26 all relevant respects, and thus is representative of the Accused Products.

27                    40. The Court has not yet construed the meaning of any claims or terms in  
28 the '688 patent. In providing these detailed allegations, Canon does not intend to

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1 convey or imply any particular claim construction or the precise scope of the  
2 claims. Canon’s contentions regarding the construction of the claims will be  
3 provided in compliance with the case schedule, any applicable federal or local  
4 procedural rules, and/or any applicable orders.

5 41. Canon contends that each element of each asserted claim is literally  
6 present in the Accused Products. If as a result of the Court’s constructions or other  
7 determinations one or more claim elements are not literally present, Canon  
8 contends that each such element is present under the doctrine of equivalents and  
9 reserves its right to provide more detailed doctrine of equivalents contentions after  
10 discovery, a claim construction order from the Court, or at another appropriate  
11 time.

12 **Infringement of the ’688 Patent by the NHCE310A Toner Cartridge**

13 42. The NHCE310A toner cartridge infringes claim 1 of the ’688 patent.

14 43. Claim 1 of the ’688 patent recites: “An image forming apparatus  
15 cartridge comprising:

- 16 (a) a casing;
- 17 (b) developer contained in the casing;
- 18 (c) a developing roller having an axis L1, the developing roller  
19 being rotatably supported in the casing to permit rotation about  
20 the axis L1; and
- 21 (d) a coupling member having an axis L2 and including (i) a first  
22 end portion operatively connected to the developing roller, (ii) a  
23 second end portion including at least one projection having a  
24 slanted surface with respect to a plane perpendicular to the axis  
25 L2, and (iii) a connecting portion connecting the first end  
26 portion and the second end portion,
- 27 (e) wherein, as measured along a line perpendicular to the axis L2,  
28 a maximum distance from the axis L2 to an outermost surface

of the connecting portion is shorter than a distance between the axis L2 and the at least one projection, and

(f) wherein the coupling member is movable between (i) a first position in which a tip of the at least one projection is a first distance away from the developing roller as measured in the direction of the axis L1 and (ii) a second position in which the tip of the at least one projection is a second distance away from the developing roller as measured in the direction of the axis L1, wherein the first distance is greater than the second distance.”

44. As shown in Figure 1-1 below, the NHCE310A toner cartridge is an image forming apparatus cartridge, also known as a toner cartridge.



Fig. 1-1

45. As shown in Figure 1-2 below, the toner cartridge has a casing, with developer contained within the casing.



Fig. 1-2

46. As shown in Figure 1-3 below, the toner cartridge has a developing roller having an axis L1. The developing roller is rotatably supported in the casing to permit rotation about the axis L1.

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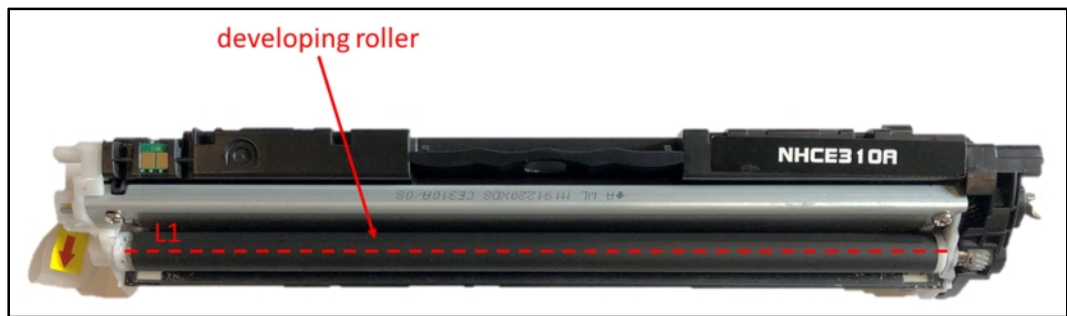


Fig. 1-3

47. As shown in Figure 1-4 below, the toner cartridge has a coupling member.

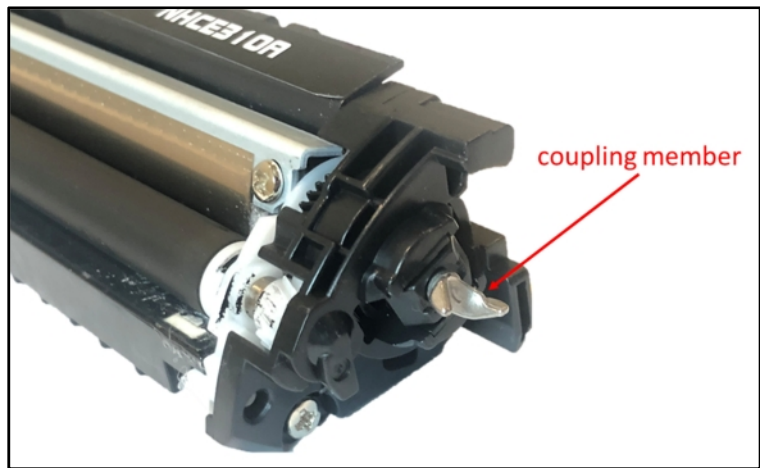


Fig. 1-4

48. As shown in Figure 1-5 below, the coupling member (shown removed from the cartridge) has an axis L2.

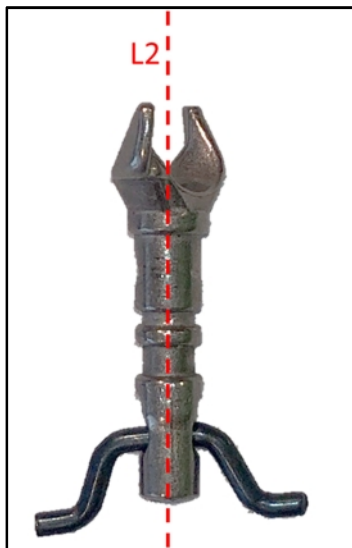
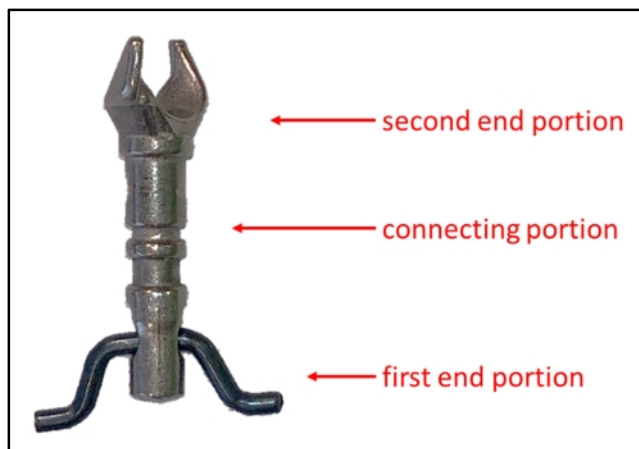


Fig. 1-5

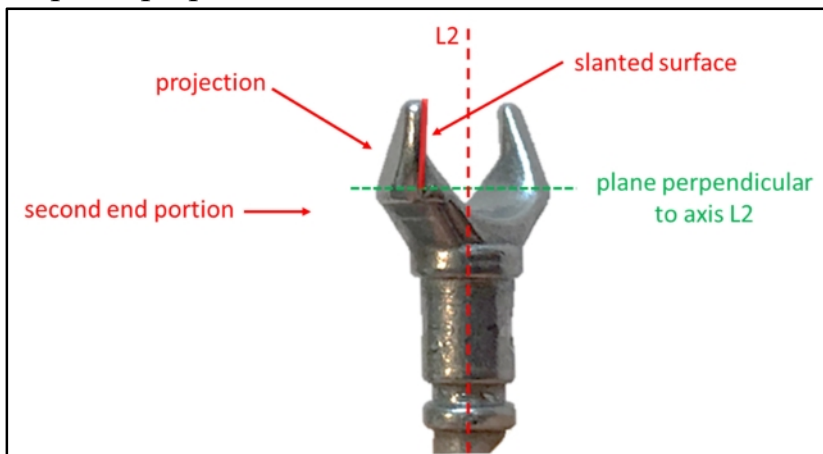
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1 49. As shown in Figure 1-6 below, the coupling member has a first end  
2 portion, a second end portion, and a connecting portion connecting the first end  
3 portion and the second end portion. In an assembled cartridge (shown in Figures  
4 1-1 and 1-4 above), the first end portion is operatively connected to the developing  
5 roller.



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13 Fig. 1-6

14 50. As shown in Figures 1-7, 1-8, and 1-9 below, the second end portion  
15 of the coupling member includes at least one projection having a slanted surface  
16 with respect to a plane perpendicular to the axis L2.



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24 Fig. 1-7 (a slanted surface)

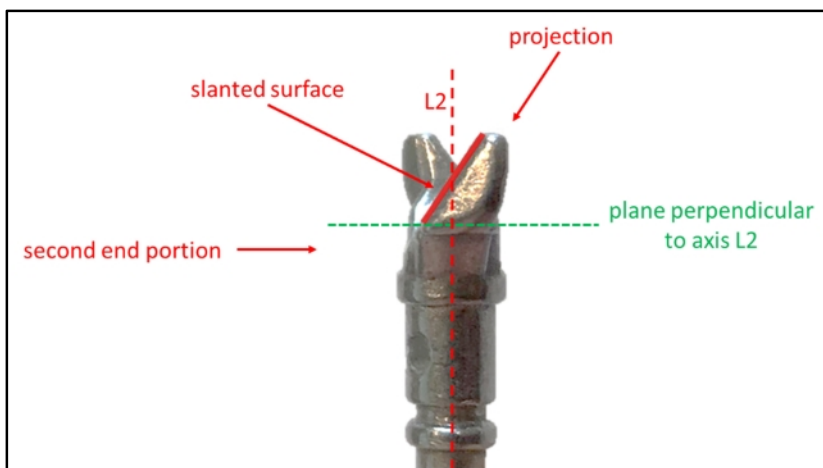


Fig. 1-8 (another slanted surface)

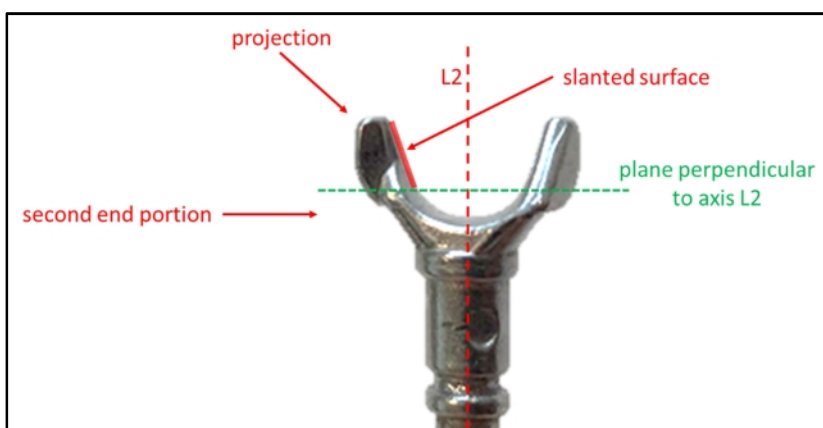


Fig. 1-9 (another slanted surface)

51. As shown in Figure 1-10 below, as measured along a line perpendicular to the axis L2, a maximum distance from the axis L2 to an outermost surface of the connecting portion (annotated as  $D_{max}$ ) is shorter than a distance between the axis L2 and the at least one projection (annotated as  $D_{projection}$ ).

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Fig. 1-10

52. As shown in Figure 1-11 below, the coupling member is movable between: (i) a first position in which a tip of the at least one projection is a first distance away from the developing roller as measured in the direction of the axis L1 (annotated as  $D_1$  in the left image); and (ii) a second position in which the tip of the at least one projection is a second distance away from the developing roller as measured in the direction of the axis L1 (annotated  $D_2$  in the right image), with the first distance ( $D_1$ ) being greater than the second distance ( $D_2$ ).

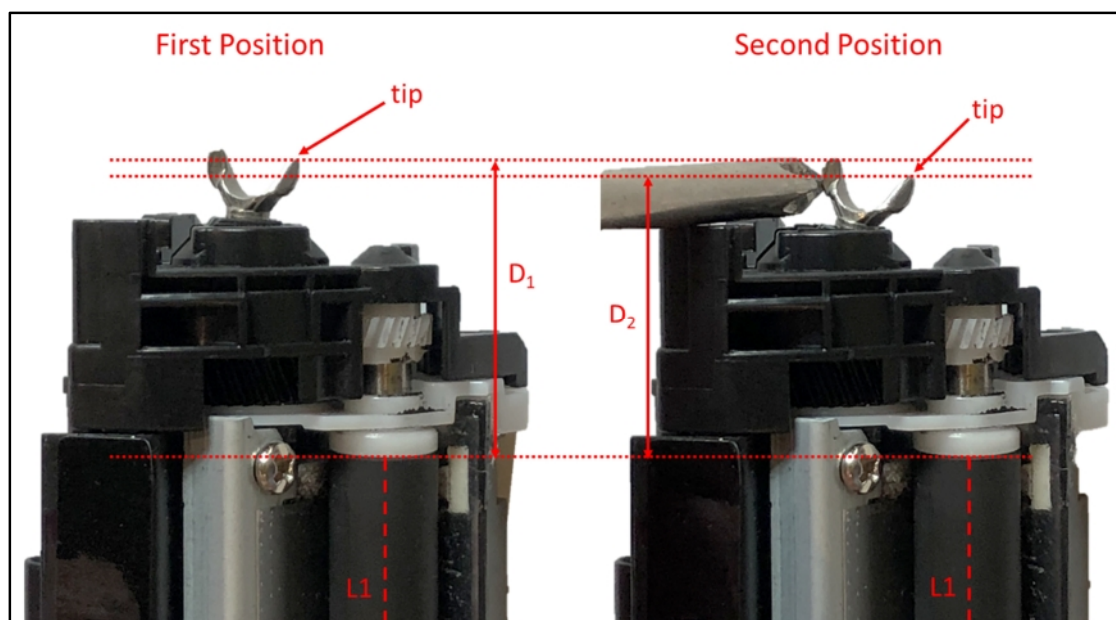


Fig. 1-11

53. The NHCE310A toner cartridge also infringes claim 10 of the '688 patent.

54. Claim 10 of the '688 patent recites "An image forming apparatus cartridge comprising:

- (a) a casing;
- (b) developer contained in the casing;
- (c) a developing roller having an axis L1, the developing roller being rotatably supported in the casing to permit rotation about the axis L1; and
- (d) a coupling member having an axis L2 and including (i) a first end portion operatively connected to the developing roller, (ii) a second end portion including at least one projection, with the at least one projection including a surface that extends at an obtuse angle from an adjacent surface of the second end portion, and (iii) a connecting portion connecting the first end portion and the second end portion,
- (e) wherein, as measured along a line perpendicular to the axis L2, a maximum distance from the axis L2 to an outermost surface

1 of the connecting portion is shorter than a distance between the  
2 axis L2 and the at least one projection, and

3 (f) wherein the coupling member is movable between (i) a first  
4 position in which a tip of the at least one projection is a first  
5 distance away from the developing roller as measured in the  
6 direction of the axis L1 and (ii) a second position in which the  
7 tip of the at least one projection is a second distance away from  
8 the developing roller as measured in the direction of the axis  
9 L1, wherein the first distance is greater than the second  
10 distance.”

11 55. As shown in Figure 1-1 above, the NHCE310A toner cartridge is an  
12 image forming apparatus cartridge, also known as a toner cartridge.

13 56. As shown in Figure 1-2 above, the toner cartridge has a casing, with  
14 developer contained in the casing.

15 57. As shown in Figure 1-3 above, the toner cartridge has a developing  
16 roller having an axis L1. The developing roller is rotatably supported in the casing  
17 to permit rotation about the axis L1.

18 58. As shown in Figure 1-4 above, the toner cartridge has a coupling  
19 member.

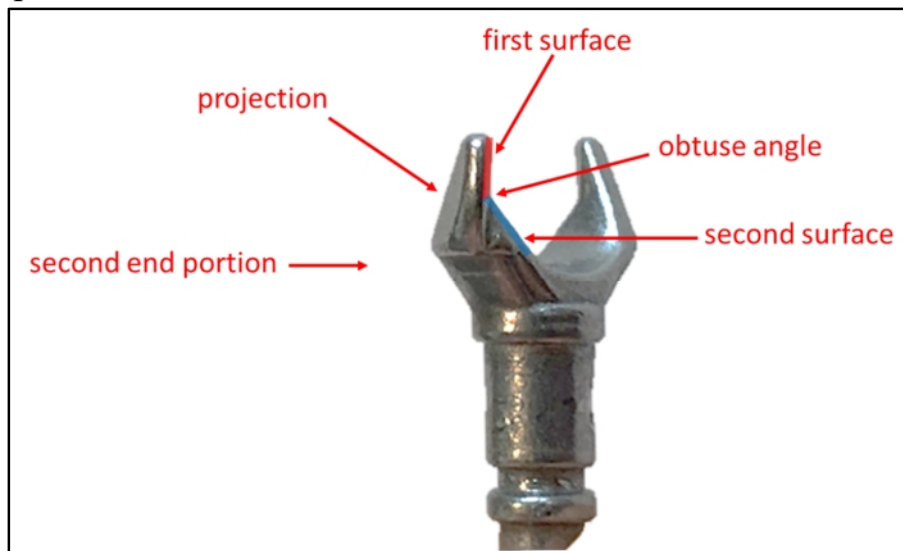
20 59. As shown in Figure 1-5 above, the coupling member (shown removed  
21 from the cartridge) has an axis L2.

22 60. As shown in Figures 1-5 and 1-6 above, the coupling member  
23 includes a first end portion, a second end portion, and a connecting portion  
24 connecting the first end portion and the second end portion. In an assembled  
25 cartridge (shown in Figures 1-1 and 1-4 above), the first end portion is operatively  
26 connected to the developing roller.

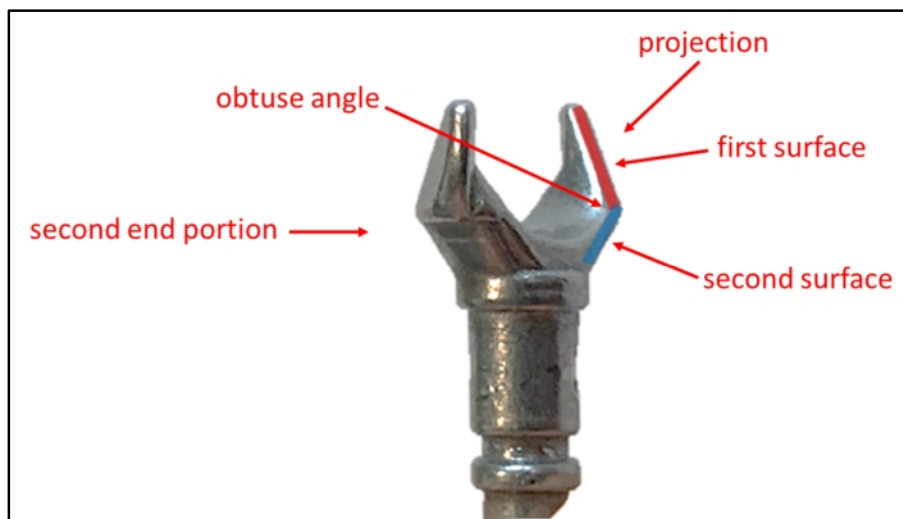
27 61. As shown in Figures 1-12, 1-13, and 1-14 below, the second end  
28 portion includes at least one projection, with the at least one projection including a



1 surface (labeled first surface in the images below) that extends at an obtuse angle  
2 from an adjacent surface (labeled second surface in the images below) of the  
3 second end portion.



12 Fig. 1-12 (a surface extending at an obtuse angle)



22 Fig. 1-13 (another surface extending at an obtuse angle)

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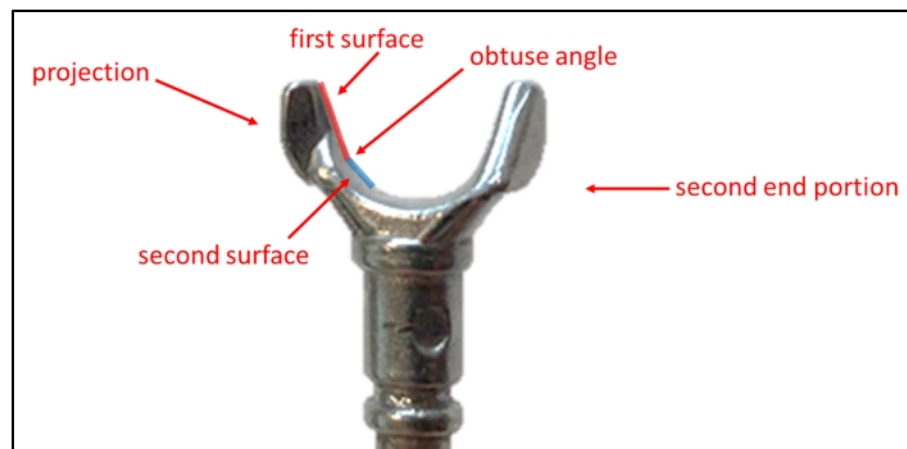


Fig. 1-14 (another surface extending at an obtuse angle)

62. As shown in Figure 1-10 above, as measured along a line perpendicular to the axis L2, a maximum distance from the axis L2 to an outermost surface of the connecting portion is shorter than a distance between the axis L2 and the at least one projection.

63. As shown in Figure 1-11 above, the coupling member is movable between: (i) a first position in which a tip of the at least one projection is a first distance away from the developing roller as measured in the direction of the axis L1 (annotated as  $D_1$  in the left image); and (ii) a second position in which the tip of the at least one projection is a second distance away from the developing roller as measured in the direction of the axis L1 (annotated  $D_2$  in the right image), with the first distance ( $D_1$ ) being greater than the second distance ( $D_2$ ).

64. The NHCE310A toner cartridge also infringes claim 19 of the '688 patent.

65. Claim 19 of the '688 patent recites "An image forming apparatus cartridge comprising:

- (a) a casing;
- (b) developer contained in the casing;
- (c) a developing roller having an axis L1, the developing roller being rotatably supported in the casing to permit rotation about the axis L1;

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- 1 (d) a rotatable member rotatably supported in the casing and
- 2 operatively connected to the developing roller;
- 3 (e) a coupling member having an axis L2 and including (i) a first
- 4 end portion connected to the rotatable member, (ii) a second
- 5 end portion including at least one projection, and (iii) a
- 6 connecting portion connecting the first end portion and the
- 7 second end portion; and
- 8 (f) an urging member configured to move the coupling member
- 9 with respect to the rotatable member,
- 10 (g) wherein, as measured along a line perpendicular to the axis L2,
- 11 a maximum distance from the axis L2 to an outermost surface
- 12 of the connecting portion is shorter than a distance between the
- 13 axis L2 and the at least one projection,
- 14 (h) wherein the coupling member is movable between (i) a first
- 15 position in which a tip of the at least one projection is a first
- 16 distance away from the rotatable member as measured in the
- 17 direction of the axis L1 and (ii) a second position in which the
- 18 tip of the at least one projection is a second distance away from
- 19 the rotatable member as measured in the direction of the axis
- 20 L1, wherein the first distance is greater than the second
- 21 distance, and
- 22 (i) wherein, in the direction of the axis L1, an outer end of the
- 23 rotatable member is more remote from the developing roller
- 24 than an outer end of the urging member is from the developing
- 25 roller in the direction of the axis L1.”

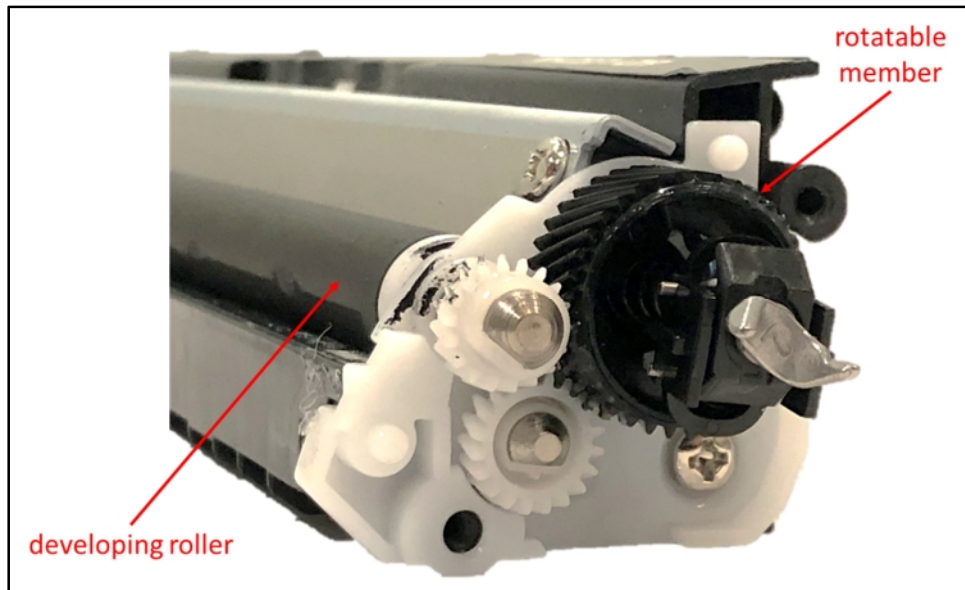
26 66. As shown in Figure 1-1 above, the NHCE310A toner cartridge is an  
27 image forming apparatus cartridge, also known as a toner cartridge.

28 67. As shown in Figure 1-2 above, the toner cartridge has a casing, with

1 developer contained in the casing.

2 68. As shown in Figure 1-3 above, the toner cartridge has a developing  
3 roller having an axis L1. The developing roller is rotatably supported in the casing  
4 to permit rotation about the axis L1.

5 69. As shown in Figure 1-15 below, the toner cartridge has a rotatable  
6 member rotatably supported in the casing and operatively connected to the  
7 developing roller.



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17 Fig. 1-15

18 70. As shown in Figures 1-5 and 1-6 above, the toner cartridge has a  
19 coupling member having an axis L2 and including a first end portion, a second end  
20 portion, and a connecting portion connecting the first end portion and the second  
21 end portion. As shown in Figures 1-7, 1-8, and 1-9 above, the second end portion  
22 includes at least one projection. As shown in Figure 1-16 below, the first end  
23 portion is connected to the rotatable member.

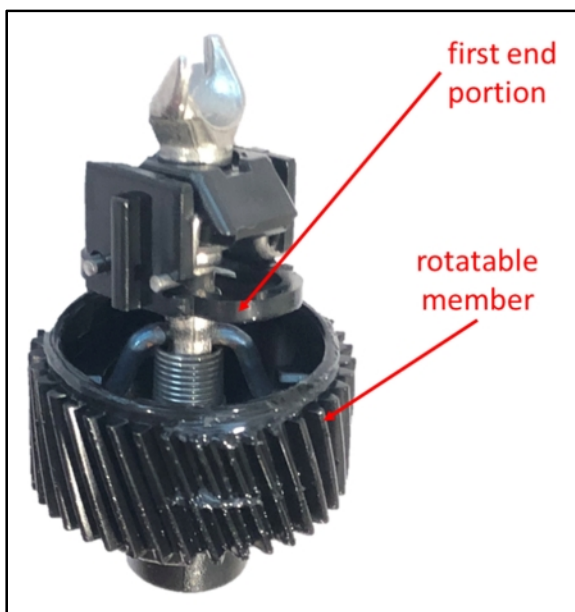


Fig. 1-16

71. As shown in Figure 1-17 below, the toner cartridge has an urging member configured to move the coupling member with respect to the rotatable member.

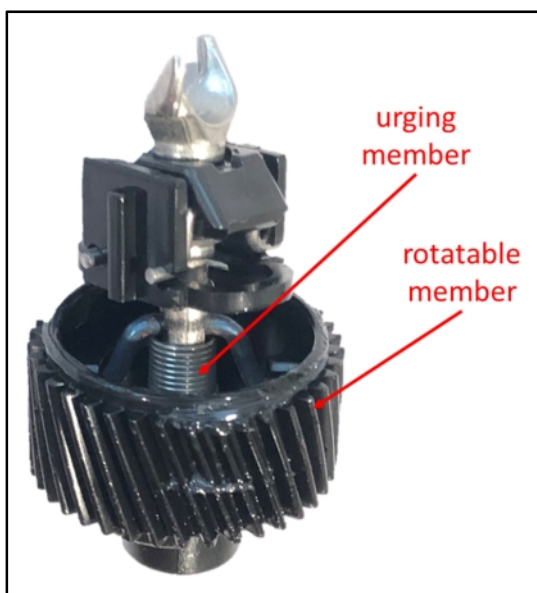
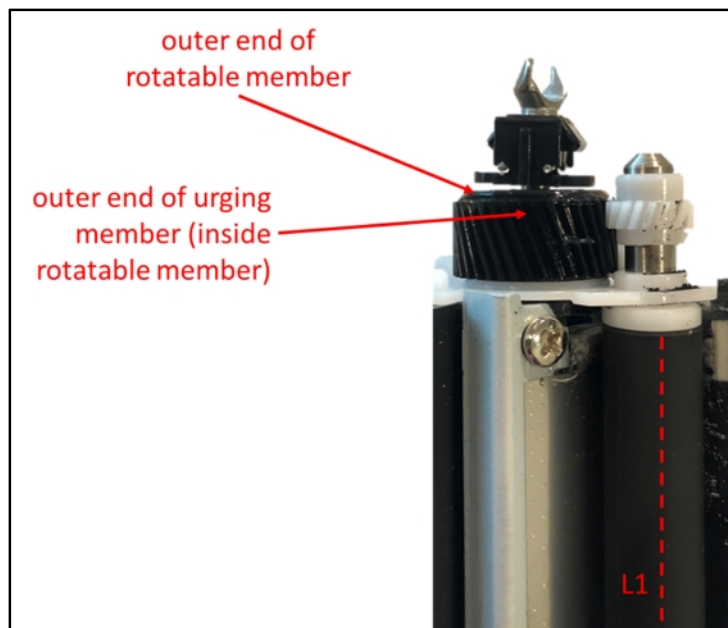


Fig. 1-17

72. As shown in Figure 1-10 above, as measured along a line perpendicular to the axis L2, a maximum distance from the axis L2 to an outermost surface of the connecting portion is shorter than a distance between the axis L2 and the at least one projection.

1           73. As shown in Figure 1-11 above, the coupling member is movable  
 2 between: (i) a first position in which a tip of the at least one projection is a first  
 3 distance away from the developing roller as measured in the direction of the axis  
 4 L1 (annotated as  $D_1$  in the left image); and (ii) a second position in which the tip of  
 5 the at least one projection is a second distance away from the developing roller as  
 6 measured in the direction of the axis L1 (annotated  $D_2$  in the right image), with the  
 7 first distance ( $D_1$ ) being greater than the second distance ( $D_2$ ).

8           74. As shown in Figure 1-18 below, in the direction of the axis L1, an  
 9 outer end of the rotatable member is more remote from the developing roller than  
 10 an outer end of the urging member is from the developing roller in the direction of  
 11 the axis L1. As can be seen in the figure, the outer end of the urging member is  
 12 inside of the rotatable member.



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Fig. 1-18

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24           75. The NHCE310A toner cartridge also infringes claim 24 of the '688  
 25 patent.

26           76. Claim 24 of the '688 patent recites "An image forming apparatus  
 27 cartridge comprising:

- 28           (a) a casing;

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- 1 (b) developer contained in the casing;
- 2 (c) a developing roller having an axis L1, the developing roller
- 3 being rotatably supported in the casing to permit rotation about
- 4 the axis L1;
- 5 (d) a rotatable member rotatably supported in the casing and
- 6 operatively connected to the developing roller;
- 7 (e) a coupling member having an axis L2 and including (i) a first
- 8 end portion connected to the rotatable member, (ii) a second
- 9 end portion including at least one projection, and (iii) a
- 10 connecting portion connecting the first end portion and the
- 11 second end portion; and
- 12 (f) an urging member configured to move the coupling member
- 13 with respect to the rotatable member,
- 14 (g) wherein, as measured along a line perpendicular to the axis L2,
- 15 a maximum distance from the axis L2 to an outermost surface
- 16 of the connecting portion is shorter than a distance between the
- 17 axis L2 and the at least one projection,
- 18 (h) wherein the coupling member is movable between (i) a first
- 19 position in which a tip of the at least one projection is a first
- 20 distance away from the rotatable member as measured in the
- 21 direction of the axis L1 and (ii) a second position in which the
- 22 tip of the at least one projection is a second distance away from
- 23 the rotatable member as measured in the direction of the axis
- 24 L1, wherein the first distance is greater than the second
- 25 distance, and
- 26 (i) wherein at least a part of the urging member is surrounded by
- 27 the rotatable member.

28 77. As shown in Figure 1-1 above, the NHCE310A toner cartridge is an

1 image forming apparatus cartridge, also known as a toner cartridge.

2 78. As shown in Figure 1-2 above, the toner cartridge has a casing, with  
3 developer contained in the casing.

4 79. As shown in Figure 1-3 above, the toner cartridge has a developing  
5 roller having an axis L1. The developing roller is rotatably supported in the casing  
6 to permit rotation about the axis L1.

7 80. As shown in Figure 1-15 above, the toner cartridge has a rotatable  
8 member rotatably supported in the casing and operatively connected to the  
9 developing roller.

10 81. As shown in Figures 1-5 and 1-6 above, the toner cartridge has a  
11 coupling member having an axis L2 and including a first end portion, a second end  
12 portion, and a connecting portion connecting the first end portion and the second  
13 end portion. As shown in Figures 1-7, 1-8, and 1-9 above, the second end portion  
14 includes at least one projection. As shown in Figure 1-16 above, the first end  
15 portion is connected to the rotatable member.

16 82. As shown in Figure 1-17 above, the toner cartridge has an urging  
17 member configured to move the coupling member with respect to the rotatable  
18 member.

19 83. As shown in Figure 1-10 above, as measured along a line  
20 perpendicular to the axis L2, a maximum distance from the axis L2 to an outermost  
21 surface of the connecting portion is shorter than a distance between the axis L2 and  
22 the at least one projection.

23 84. As shown in Figure 1-11 above, the coupling member is movable  
24 between: (i) a first position in which a tip of the at least one projection is a first  
25 distance away from the developing roller as measured in the direction of the axis  
26 L1 (annotated as  $D_1$  in the left image); and (ii) a second position in which the tip of  
27 the at least one projection is a second distance away from the developing roller as  
28 measured in the direction of the axis L1 (annotated  $D_2$  in the right image), with the



1 first distance ( $D_1$ ) being greater than the second distance ( $D_2$ ).

2 85. As shown in Figure 1-18 above, at least a part of the urging member is  
3 surrounded by the rotatable member.

4 86. Defendants' acts complained of herein are damaging and will  
5 continue to cause irreparable injury and damage to Canon for which there is no  
6 adequate remedy at law. Canon is therefore entitled to preliminary and permanent  
7 injunctions restraining and enjoining Defendants from infringing the claims of the  
8 '688 patent.

9 87. By reason of Defendants' infringing activities, Canon has suffered,  
10 and will continue to suffer, substantial damages in an amount to be determined at  
11 trial.

12 **Second Cause of Action: Infringement of U.S. Patent No. 9,857,766**

13 88. Canon repeats and incorporates by reference the allegations of  
14 paragraphs 1-34 above, as though set forth here in their entirety.

15 89. Defendants have directly infringed and are directly infringing the '766  
16 patent by making, using, selling, and/or offering to sell in the United States and/or  
17 importing into the United States toner cartridges embodying the invention defined  
18 by one or more claims of the '766 patent, including without limitation the Accused  
19 Products, without authority or license of Canon. More particularly, Defendants'  
20 manufacture, use, sale, and/or offer for sale in the United States and/or importation  
21 into the United States of at least the Accused Products infringes at least claims 1,  
22 10, 13, and 14 of the '766 patent.

23 90. Defendants also are indirectly infringing the '766 patent at least by  
24 virtue of their inducement of direct infringement of that patent by customers who  
25 use Defendants' Accused Products in at least the Canon and HP laser beam printers  
26 listed above. At the very latest, Defendants will be given notice of their  
27 infringement of the '766 patent upon being served with or otherwise receiving this  
28 Complaint. On information and belief, Defendants knowingly induce customers to

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1 use their Accused Products, including, for example, by promoting them for use in  
2 specific printers and/or providing customers with instructions for using them in  
3 those printers.

4 91. The following paragraphs 95-114 show how Defendants' model  
5 NHCE310A toner cartridge, which is an example of an Accused Product, infringes  
6 independent claims 1 and 10 of the '766 patent.

7 92. Upon information and belief, the exemplary model NHCE310A toner  
8 cartridge shown herein is substantially the same as the other Accused Products in  
9 all relevant respects, and thus is representative of the Accused Products.

10 93. The Court has not yet construed the meaning of any claims or terms in  
11 the '766 patent. In providing these detailed allegations, Canon does not intend to  
12 convey or imply any particular claim construction or the precise scope of the  
13 claims. Canon's contentions regarding the construction of the claims will be  
14 provided in compliance with the case schedule, any applicable federal or local  
15 procedural rules, and/or any applicable orders.

16 94. Canon contends that each element of each asserted claim is literally  
17 present in the Accused Products. If as a result of the Court's constructions or other  
18 determinations one or more claim elements are not literally present, Canon  
19 contends that each such element is present under the doctrine of equivalents and  
20 reserves its right to provide more detailed doctrine of equivalents contentions after  
21 discovery, a claim construction order from the Court, or at another appropriate  
22 time.

23 **Infringement of the '766 Patent by the NHCE310A Toner Cartridge**

24 95. The NHCE310A toner cartridge infringes claim 1 of the '766 patent.

25 96. Claim 1 of the '766 patent recites: "An image forming apparatus  
26 cartridge comprising:

- 27 (a) a casing;  
28 (b) developer contained in the casing;

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- (c) a developing roller having an axis L1, the developing roller being rotatably supported in the casing to permit rotation about the axis L1; and
- (d) a coupling member having an axis L2 and including
  - (i) a first end portion operatively connected to the developing roller,
  - (ii) a second end portion having an outermost surface,
  - (iii) an axle portion connecting the first end portion and the second end portion to each other, and
  - (iv) at least one projection extending from the second end portion,
- (e) wherein, for at least part of the outermost surface of the second end portion, a maximum distance from the axis L2 to the outermost surface along a line perpendicular to the axis L2 increases as the distance along the axis L2 from the axle portion increases, and
- (f) wherein the coupling member is movable between a first position in which a tip of the at least one projection is a first distance away from the developing roller as measured in the direction of the axis L1 and a second position in which the tip of the at least one projection is a second distance away from the developing roller as measured in the direction of the axis L1, with the first distance being greater than the second distance.”

97. As shown in Figure 2-1 below, the NHCE310A toner cartridge is an image forming apparatus cartridge, also known as a toner cartridge.



Fig. 2-1

98. As shown in Figure 2-2 below, the toner cartridge has a casing, with developer contained within the casing.



Fig. 2-2

99. As shown in Figure 2-3 below, the toner cartridge has a developing roller having an axis L1. The developing roller is rotatably supported in the casing to permit rotation about the axis L1.

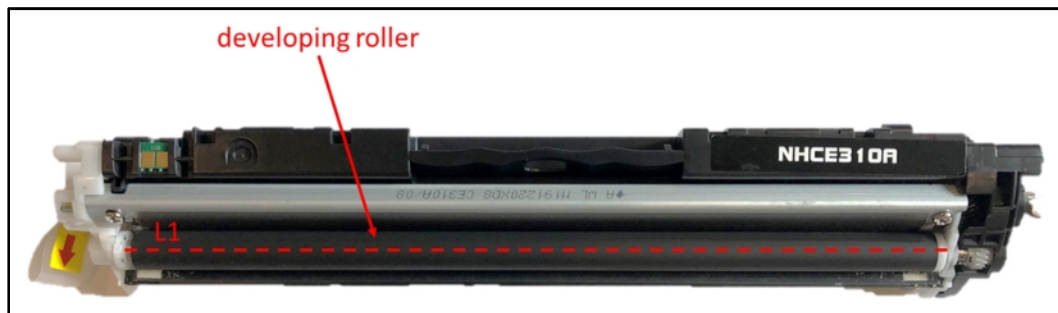


Fig. 2-3

100. As shown in Figure 2-4 below, the toner cartridge has a coupling member.

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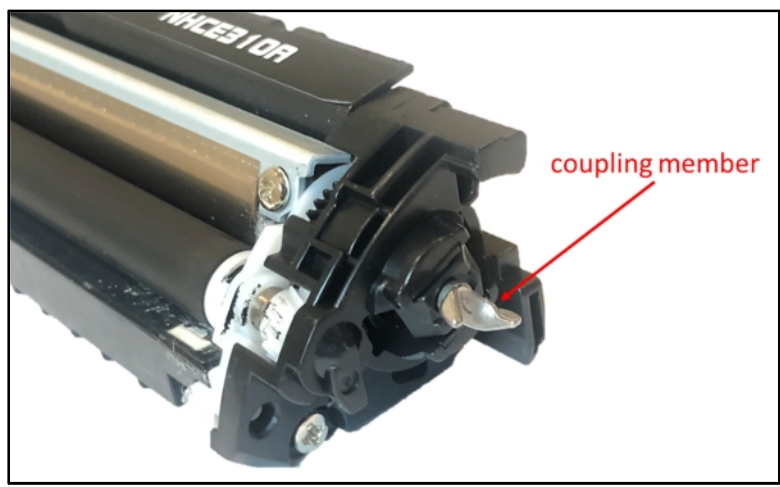


Fig. 2-4

101. As shown in Figure 2-5 below, the coupling member (shown removed from the cartridge) has an axis L2.



Fig. 2-5

102. As shown in Figure 2-6 below, the coupling member has a first end portion, a second end portion having an outermost surface, an axle portion connecting the first end portion and the second end portion to each other, and at least one projection extending from the second end portion. In an assembled cartridge (shown in Figs. 2-1 and 2-4 above), the first end portion is operatively connected to the developing roller.

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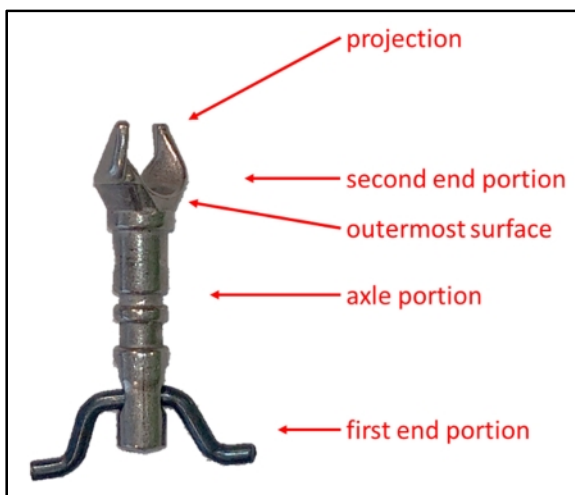


Fig. 2-6

103. As shown in Figure 2-7 below, for at least part of the outermost surface of the second end portion, a maximum distance from the axis L2 to the outermost surface along a line perpendicular to the axis L2 increases as the distance along the axis L2 from the axle portion increases ( $Max_2$ , which is farther from the axle portion, is greater than  $Max_1$ ).



Fig. 2-7

104. As shown in Figure 2-8 below, the coupling member is movable between: (i) a first position in which a tip of the at least one projection is a first distance away from the developing roller as measured in the direction of the axis L1 (annotated as  $D_1$  in the left image); and (ii) a second position in which the tip of

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1 the at least one projection is a second distance away from the developing roller as  
 2 measured in the direction of the axis L1 (annotated  $D_2$  in the right image), with the  
 3 first distance ( $D_1$ ) being greater than the second distance ( $D_2$ ).

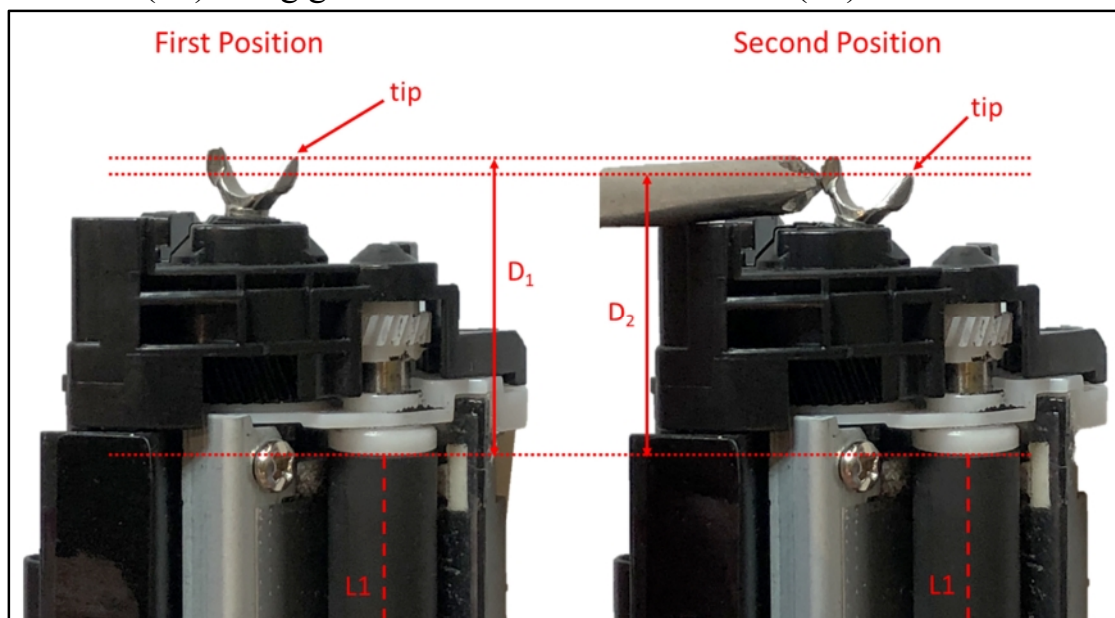


Fig. 2-8

15 105. The NHCE310A toner cartridge also infringes claim 10 of the '766  
 16 patent.

17 106. Claim 10 of the '766 patent recites "An image forming apparatus  
 18 cartridge comprising:

- 19 (a) a casing;
- 20 (b) developer contained in the casing;
- 21 (c) a developing roller having an axis L1, the developing roller  
 22 being rotatably supported in the casing to permit rotation about  
 23 the axis L1; and
- 24 (d) a coupling member having an axis L2, the coupling member  
 25 including
  - 26 (i) a first end portion operatively connected to the  
 27 developing roller,
  - 28 (ii) a second end portion including at least one projection that  
 is open to the axis L2, and

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- 1 (iii) a connecting portion connecting the first end portion and
- 2 the second end portion,
- 3 (e) wherein at least a part of an outermost surface of the second end
- 4 portion tapers inwardly toward the axis L2 as the distance along
- 5 the axis L2 towards the connecting portion decreases, and
- 6 (f) wherein the coupling member is movable between (i) a first
- 7 position in which a tip of the at least one projection is a first
- 8 distance away from the developing roller as measured in the
- 9 direction of the axis L1 and (ii) a second position in which the
- 10 tip of the at least one projection is a second distance away from
- 11 the developing roller as measured in the direction of the axis
- 12 L1, with the first distance being greater than the second
- 13 distance.”

14 107. As shown in Figure 2-1 above, the NHCE310A toner cartridge is an  
15 image forming apparatus cartridge, also known as a toner cartridge.

16 108. As shown in Figure 2-2 above, the toner cartridge has a casing, with  
17 developer contained within the casing.

18 109. As shown in Figure 2-3 above, the toner cartridge has a developing  
19 roller having an axis L1. The developing roller is rotatably supported in the casing  
20 to permit rotation about the axis L1.

21 110. As shown in Figure 2-4 above, the toner cartridge has a coupling  
22 member.

23 111. As shown in Figure 2-5 above, the coupling member (shown removed  
24 from the cartridge) has an axis L2.

25 112. As shown in Figure 2-9 below, the coupling member includes a first  
26 end portion, a second end portion including at least one projection that is open to  
27 the axis L2, and a connecting portion connecting the first end portion and the  
28 second end portion. In an assembled cartridge (shown in Figs. 2-1 and 2-4 above),



1 the first end portion is operatively connected to the developing roller.

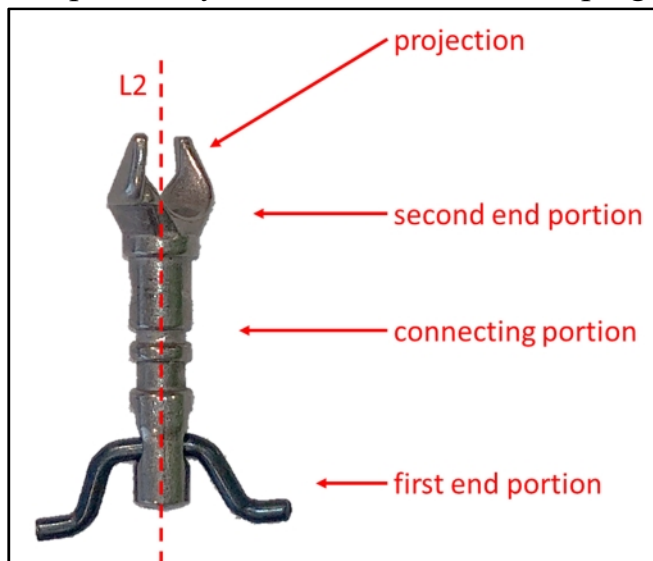


Fig. 2-9

113. As shown in Figure 2-10 below, at least a part of an outermost surface of the second end portion tapers inwardly toward the axis L2 as the distance along the axis L2 towards the connecting portion decreases.

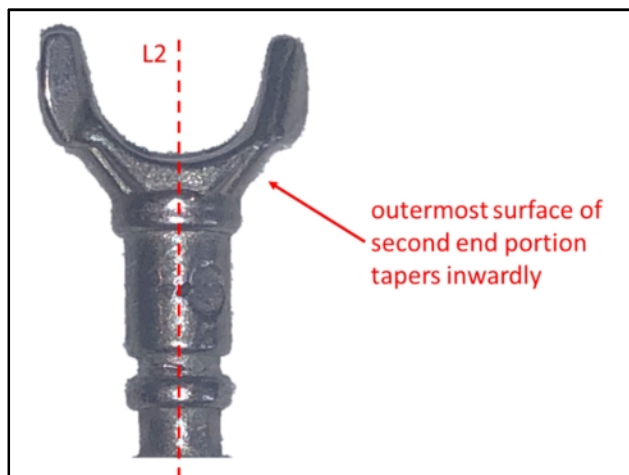


Fig. 2-10

114. As shown in Figure 2-8 above, the coupling member is movable between: (i) a first position in which a tip of the at least one projection is a first distance away from the developing roller as measured in the direction of the axis L1 (annotated as  $D_1$  in the left image); and (ii) a second position in which the tip of the at least one projection is a second distance away from the developing roller as

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1 measured in the direction of the axis L1 (annotated  $D_2$  in the right image), with the  
2 first distance ( $D_1$ ) being greater than the second distance ( $D_2$ ).

3 115. Defendants' acts complained of herein are damaging and will  
4 continue to cause irreparable injury and damage to Canon for which there is no  
5 adequate remedy at law. Canon is therefore entitled to preliminary and permanent  
6 injunctions restraining and enjoining Defendants from infringing the claims of the  
7 '766 patent.

8 116. By reason of Defendants' infringing activities, Canon has suffered,  
9 and will continue to suffer, substantial damages in an amount to be determined at  
10 trial.

11 **Third Cause of Action: Infringement of U.S. Patent No. 10,620,582**

12 117. Canon repeats and incorporates by reference the allegations of  
13 paragraphs 1-34 above, as though set forth here in their entirety.

14 118. Defendants have directly infringed and are directly infringing the '582  
15 patent by making, using, selling, and/or offering to sell in the United States and/or  
16 importing into the United States toner cartridges embodying the invention defined  
17 by one or more claims of the '582 patent, including without limitation the Accused  
18 Products, without authority or license of Canon. More particularly, Defendants'  
19 manufacture, use, sale, and/or offer for sale in the United States and/or importation  
20 into the United States of at least the Accused Products infringes at least claims 1-7,  
21 9-16, 18-26, 28-35, 37, and 38 of the '582 patent.

22 119. Defendants also are indirectly infringing the '582 patent at least by  
23 virtue of their inducement of direct infringement of that patent by customers who  
24 use Defendants' Accused Products in at least the Canon and HP laser beam printers  
25 listed above. At the very latest, Defendants will be given notice of their  
26 infringement of the '582 patent upon being served with or otherwise receiving this  
27 Complaint. On information and belief, Defendants knowingly induce customers to  
28 use their Accused Products, including, for example, by promoting them for use in

1 specific printers and/or providing customers with instructions for using them in  
2 those printers.

3 120. The following paragraphs 124-163 show how Defendants' model  
4 NHCE310A toner cartridge, which is an example of an Accused Product, infringes  
5 independent claims 1, 11, 20, and 30 of the '582 patent.

6 121. Upon information and belief, the exemplary model NHCE310A toner  
7 cartridge shown herein is substantially the same as the other Accused Products in  
8 all relevant respects, and thus is representative of the Accused Products.

9 122. The Court has not yet construed the meaning of any claims or terms in  
10 the '582 patent. In providing these detailed allegations, Canon does not intend to  
11 convey or imply any particular claim construction or the precise scope of the  
12 claims. Canon's contentions regarding the construction of the claims will be  
13 provided in compliance with the case schedule, any applicable federal or local  
14 procedural rules, and/or any applicable orders.

15 123. Canon contends that each element of each asserted claim is literally  
16 present in the Accused Products. If as a result of the Court's constructions or other  
17 determinations one or more claim elements are not literally present, Canon  
18 contends that each such element is present under the doctrine of equivalents and  
19 reserves its right to provide more detailed doctrine of equivalents contentions after  
20 discovery, a claim construction order from the Court, or at another appropriate  
21 time.

22 **Infringement of the '582 Patent by the NHCE310A Toner Cartridge**

23 124. The NHCE310A toner cartridge infringes claim 1 of the '582 patent.

24 125. Claim 1 of the '582 patent recites: "An image forming apparatus  
25 cartridge comprising:

- 26 (a) a casing;  
27 (b) developer contained within the casing;  
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- 1 (c) a developer roller having an axis L1, the developer roller being
- 2 rotatably supported by the casing to permit rotation about the
- 3 axis L1; and
- 4 (d) a coupling member having an axis L2 about which the coupling
- 5 member is rotatable,
- 6 (e) the coupling member including (i) a first end portion
- 7 operatively connected to the developer roller and (ii) a second
- 8 end portion for receiving a rotational force, the second end
- 9 portion including at least two projections that are positioned at
- 10 least partly outside of the casing, each of the at least two
- 11 projections being open to the axis L2,
- 12 (f) wherein the second end portion has an outermost surface, and
- 13 for at least part of the outermost surface, a maximum distance
- 14 from the axis L2 to the outermost surface along a line
- 15 perpendicular to the axis L2 increases as the distance along the
- 16 axis L2 from the first end portion increases, and
- 17 (g) wherein the coupling member is movable between (i) a first
- 18 position in which the axis L2 of the coupling member is
- 19 substantially parallel to and offset from the axis L1 of the
- 20 developer roller, (ii) a second position in which the axis L2 of
- 21 the coupling member is inclined with respect to the position of
- 22 the axis L2 when the coupling member is in the first position,
- 23 and (iii) a third position in which the axis L2 of the coupling
- 24 member is inclined with respect to the position of the axis L2
- 25 when the coupling member is in the first position in a direction
- 26 opposite to the direction the coupling member is inclined when
- 27 in the second position.”

126. As shown in Figure 3-1 below, the NHCE310A toner cartridge is an

1 image forming apparatus cartridge, also known as a toner cartridge.



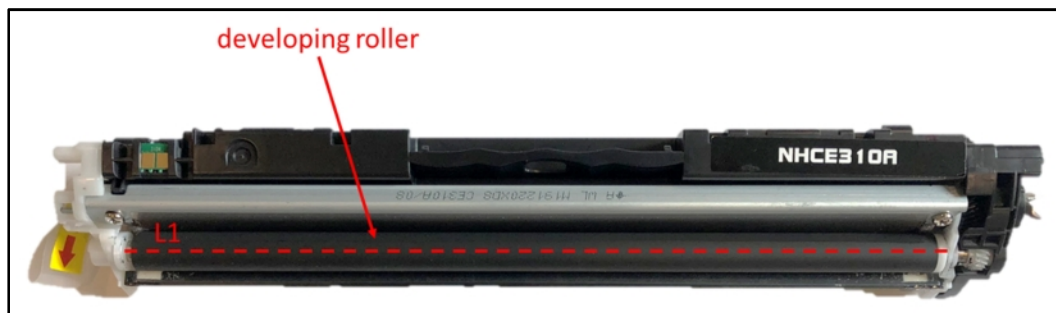
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5 Fig. 3-1

6 127. As shown in Figure 3-2 below, the toner cartridge has a casing, with  
7 developer contained within the casing.



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13 Fig. 3-2

14 128. As shown in Figure 3-3 below, the toner cartridge has a developing  
15 roller having an axis L1. The developing roller is rotatably supported in the casing  
16 to permit rotation about the axis L1.



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22 Fig. 3-3

23 129. As shown in Figure 3-4 below, the toner cartridge has a coupling  
24 member.

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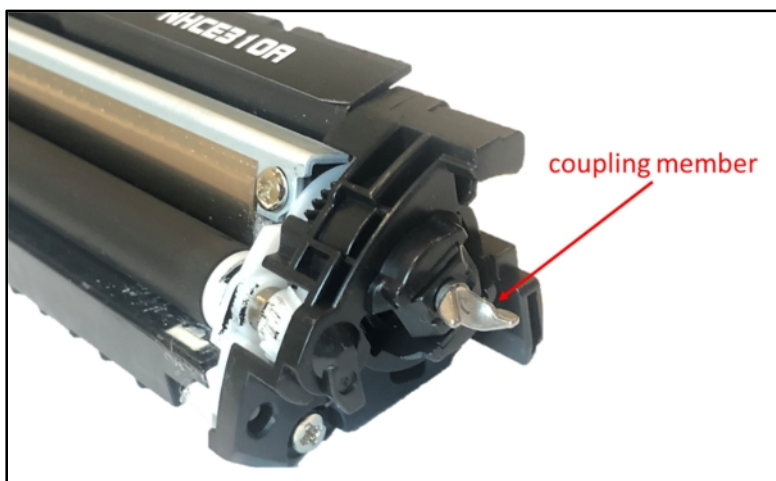


Fig. 3-4

130. As shown in Figure 3-5 below, the coupling member (shown removed from the cartridge) has an axis L2 about which the coupling member is rotatable.



Fig. 3-5

131. As shown in Figure 3-6 below, the coupling member has a first end portion and a second end portion for receiving a rotational force. The second end portion has two projections that are open to the axis L2 and are positioned at least partly outside of the casing (as shown in Figure 3-4 above). In an assembled cartridge (shown in Figures 3-1 and 3-4 above), the first end portion is operatively connected to the developing roller.

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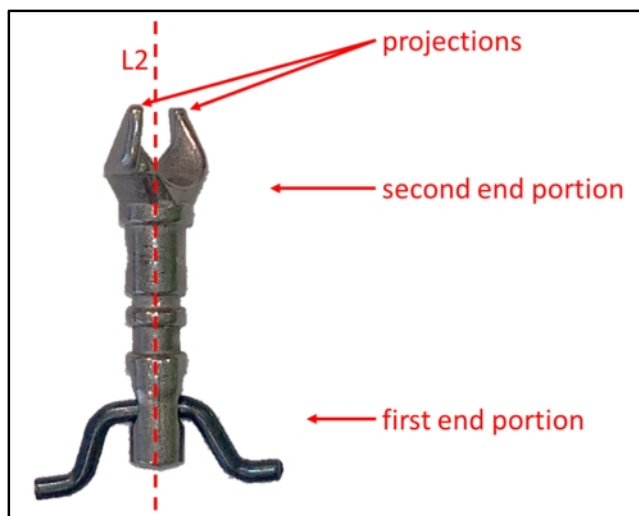


Fig. 3-6

132. As shown in Figure 3-7 below, the second end portion has an outermost surface, and for at least part of the outermost surface, a maximum distance from the axis L2 to the outermost surface along a line perpendicular to the axis L2 increases as the distance along the axis L2 from the first end portion increases ( $Max_2$ , which is farther from the first end portion, is greater than  $Max_1$ ).

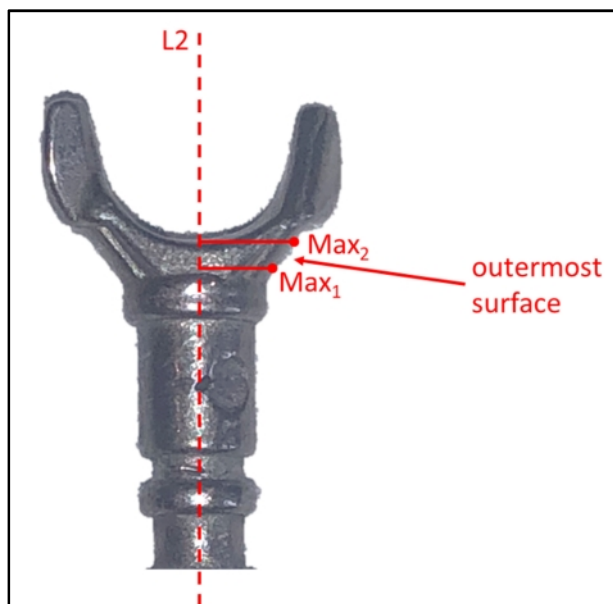


Fig. 3-7

133. As shown in Figure 3-8 below, the coupling member is movable between: (i) a first position in which the axis L2 of the coupling member is substantially parallel to and offset from the axis L1 of the developer roller; (ii) a

1 second position in which the axis L2 of the coupling member is inclined with  
 2 respect to the position of the axis L2 when the coupling member is in the first  
 3 position; and (iii) a third position in which the axis L2 of the coupling member is  
 4 inclined with respect to the position of the axis L2 when the coupling member is in  
 5 the first position in a direction opposite to the direction the coupling member is  
 6 inclined when in the second position.

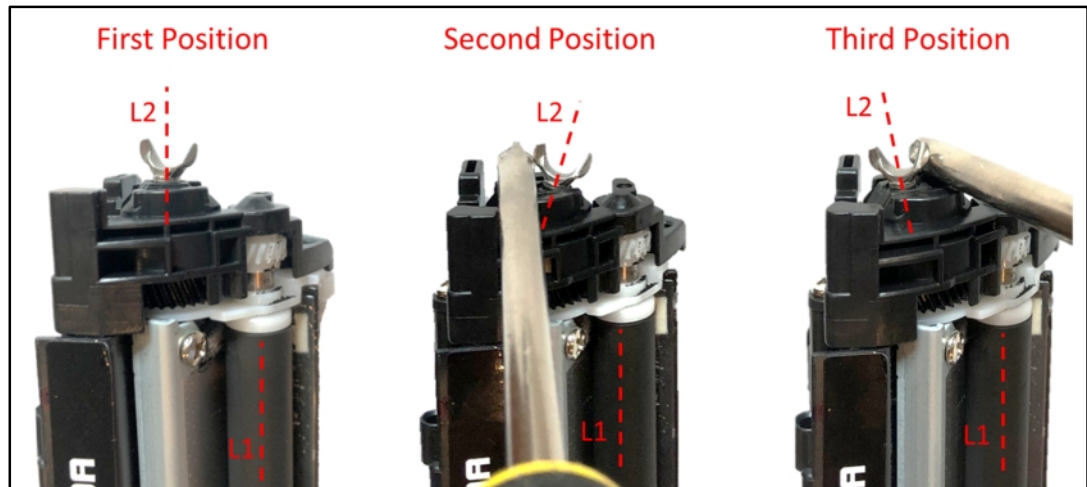


Fig. 3-8

134. The NHCE310A toner cartridge also infringes claim 11 of the '582 patent.

135. Claim 11 of the '582 patent recites "An image forming apparatus cartridge comprising:

- (a) a casing;
- (b) developer contained within the casing;
- (c) a developer roller having an axis L1, the developer roller being rotatably supported by the casing to permit rotation about the axis L1; and
- (d) a coupling member having an axis L2 about which the coupling member is rotatable,
- (e) the coupling member including (i) a first end portion operatively connected to the developer roller and (ii) a second end portion for receiving a rotational force, the second end



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1 portion including at least two projections that are positioned at  
2 least partly outside of the casing, each of the at least two  
3 projections being open to the axis L2,

4 (f) wherein the second end portion has an outermost surface, and  
5 for at least part of the outermost surface, a maximum distance  
6 from the axis L2 to the outermost surface along a line  
7 perpendicular to the axis L2 increases as the distance along the  
8 axis L2 from the first end portion increases, and

9 (g) wherein the coupling member is movable between (i) a first  
10 position in which the axis L2 of the coupling member is  
11 substantially parallel to and offset from the axis L1 of the  
12 developer roller and (ii) a second position in which the axis L2  
13 of the coupling member is inclined with respect to the position  
14 of the axis L2 when the coupling member is in the first  
15 position.”

16 136. As shown in Figure 3-1 above, the NHCE310A toner cartridge is an  
17 image forming apparatus cartridge, also known as a toner cartridge.

18 137. As shown in Figure 3-2 above, the toner cartridge has a casing, with  
19 developer contained within the casing.

20 138. As shown in Figure 3-3 above, the toner cartridge has a developing  
21 roller having an axis L1. The developing roller is rotatably supported in the casing  
22 to permit rotation about the axis L1.

23 139. As shown in Figure 3-4 above, the toner cartridge has a coupling  
24 member.

25 140. As shown in Figure 3-5 above, the coupling member (shown removed  
26 from the cartridge) has an axis L2 about which the coupling member is rotatable.

27 141. As shown in Figure 3-6 above, the coupling member has a first end  
28 portion and a second end portion for receiving a rotational force. The second end

1 portion has two projections that are open to the axis L2 and are positioned at least  
2 partly outside of the casing (as shown in Figure 3-4 above). In an assembled  
3 cartridge (shown in Figures 3-1 and 3-4 above), the first end portion is operatively  
4 connected to the developing roller.

5 142. As shown in Figure 3-7 above, the second end portion has an  
6 outermost surface, and for at least part of the outermost surface, a maximum  
7 distance from the axis L2 to the outermost surface along a line perpendicular to the  
8 axis L2 increases as the distance along the axis L2 from the first end portion  
9 increases (Max<sub>2</sub>, which is farther from the first end portion, is greater than Max<sub>1</sub>)

10 143. As shown in Figure 3-8 above, the coupling member is movable  
11 between: (i) a first position in which the axis L2 of the coupling member is  
12 substantially parallel to and offset from the axis L1 of the developer roller; and (ii)  
13 a second position in which the axis L2 of the coupling member is inclined with  
14 respect to the position of the axis L2 when the coupling member is in the first  
15 position.

16 144. The NHCE310A toner cartridge also infringes claim 20 of the '582  
17 patent.

18 145. Claim 20 of the '582 patent recites "An image forming apparatus  
19 cartridge comprising:

- 20 (a) a casing;
- 21 (b) developer contained within the casing;
- 22 (c) a developer roller having an axis L1, the developer roller being  
23 rotatably supported by the casing to permit rotation about the  
24 axis L1; and
- 25 (d) a coupling member having an axis L2 about which the coupling  
26 member is rotatable,
- 27 (e) the coupling member including (i) a first end portion  
28 operatively connected to the developer roller and (ii) a second

1 end portion for receiving a rotational force, the second end  
2 portion including at least one projection that is positioned at  
3 least partly outside of the casing, the at least one projection  
4 being open to the axis L2,

5 (f) wherein the second end portion has an outermost surface, and  
6 for at least part of the outermost surface, a maximum distance  
7 from the axis L2 to the outermost surface along a line  
8 perpendicular to the axis L2 increases as the distance along the  
9 axis L2 from the first end portion increases, and

10 (g) wherein the coupling member is movable between (i) a first  
11 position in which the axis L2 of the coupling member is  
12 substantially parallel to and offset from the axis L1 of the  
13 developer roller, (ii) a second position in which the axis L2 of  
14 the coupling member is inclined with respect to the position of  
15 the axis L2 when the coupling member is in the first position,  
16 and (iii) a third position in which the axis L2 of the coupling  
17 member is inclined with respect to the position of the axis L2  
18 when the coupling member is in the first position in a direction  
19 opposite to the direction the coupling member is inclined when  
20 in the second position.”

21 146. As shown in Figure 3-1 above, the NHCE310A toner cartridge is an  
22 image forming apparatus cartridge, also known as a toner cartridge.

23 147. As shown in Figure 3-2 above, the toner cartridge has a casing, with  
24 developer contained within the casing.

25 148. As shown in Figure 3-3 above, the toner cartridge has a developing  
26 roller having an axis L1. The developing roller is rotatably supported in the casing  
27 to permit rotation about the axis L1.

28 149. As shown in Figure 3-4 above, the toner cartridge has a coupling

1 member.

2 150. As shown in Figure 3-5 above, the coupling member (shown removed  
3 from the cartridge) has an axis L2 about which the coupling member is rotatable.

4 151. As shown in Figure 3-6 above, the coupling member has a first end  
5 portion and a second end portion for receiving a rotational force. The second end  
6 portion has at least one projection that open to the axis L2 and is positioned at least  
7 partly outside of the casing (as shown in Figure 3-4 above). In an assembled  
8 cartridge (shown in Figures 3-1 and 3-4 above), the first end portion is operatively  
9 connected to the developing roller.

10 152. As shown in Figure 3-7 above, the second end portion has an  
11 outermost surface, and for at least part of the outermost surface, a maximum  
12 distance from the axis L2 to the outermost surface along a line perpendicular to the  
13 axis L2 increases as the distance along the axis L2 from the first end portion  
14 increases (Max<sub>2</sub>, which is farther from the first end portion, is greater than Max<sub>1</sub>)

15 153. As shown in Figure 3-8 above, the coupling member is movable  
16 between: (i) a first position in which the axis L2 of the coupling member is  
17 substantially parallel to and offset from the axis L1 of the developer roller; (ii) a  
18 second position in which the axis L2 of the coupling member is inclined with  
19 respect to the position of the axis L2 when the coupling member is in the first  
20 position; and (iii) a third position in which the axis L2 of the coupling member is  
21 inclined with respect to the position of the axis L2 when the coupling member is in  
22 the first position in a direction opposite to the direction the coupling member is  
23 inclined when in the second position.

24 154. The NHCE310A toner cartridge also infringes claim 30 of the '582  
25 patent.

26 155. Claim 30 of the '582 patent recites "An image forming apparatus  
27 cartridge comprising:

28 (a) a casing;

- 1 (b) developer contained within the casing;
- 2 (c) a developer roller having an axis L1, the developer roller being
- 3 rotatably supported by the casing to permit rotation about the
- 4 axis L1; and
- 5 (d) a coupling member having an axis L2 about which the coupling
- 6 member is rotatable,
- 7 (e) the coupling member including (i) a first end portion
- 8 operatively connected to the developer roller and (ii) a second
- 9 end portion for receiving a rotational force, the second end
- 10 portion including at least one projection that is positioned at
- 11 least partly outside of the casing, the at least one projection
- 12 being open to the axis L2,
- 13 (f) wherein the second end portion has an outermost surface, and
- 14 for at least part of the outermost surface, a maximum distance
- 15 from the axis L2 to the outermost surface along a line
- 16 perpendicular to the axis L2 increases as the distance along the
- 17 axis L2 from the first end portion increases, and
- 18 (g) wherein the coupling member is movable between (i) a first
- 19 position in which the axis L2 of the coupling member is
- 20 substantially parallel to and offset from the axis L1 of the
- 21 developer roller and (ii) a second position in which the axis L2
- 22 of the coupling member is inclined with respect to the position
- 23 of the axis L2 when the coupling member is in the first
- 24 position.”

25 156. As shown in Figure 3-1 above, the NHCE310A toner cartridge is an

26 image forming apparatus cartridge, also known as a toner cartridge.

27 157. As shown in Figure 3-2 above, the toner cartridge has a casing, with

28 developer contained within the casing.

1 158. As shown in Figure 3-3 above, the toner cartridge has a developing  
2 roller having an axis L1. The developing roller is rotatably supported in the casing  
3 to permit rotation about the axis L1.

4 159. As shown in Figure 3-4 above, the toner cartridge has a coupling  
5 member.

6 160. As shown in Figure 3-5 above, the coupling member (shown removed  
7 from the cartridge) has an axis L2 about which the coupling member is rotatable.

8 161. As shown in Figure 3-6 above, the coupling member has a first end  
9 portion and a second end portion for receiving a rotational force. The second end  
10 portion has at least one projection that is open to the axis L2 and is positioned at  
11 least partly outside of the casing (as shown in Figure 3-4 above). In an assembled  
12 cartridge (shown in Figures 3-1 and 3-4 above), the first end portion is operatively  
13 connected to the developing roller.

14 162. As shown in Figure 3-7 above, the second end portion has an  
15 outermost surface, and for at least part of the outermost surface, a maximum  
16 distance from the axis L2 to the outermost surface along a line perpendicular to the  
17 axis L2 increases as the distance along the axis L2 from the first end portion  
18 increases ( $Max_2$ , which is farther from the first end portion, is greater than  $Max_1$ )

19 163. As shown in Figure 3-8 above, the coupling member is movable  
20 between: (i) a first position in which the axis L2 of the coupling member is  
21 substantially parallel to and offset from the axis L1 of the developer roller; and (ii)  
22 a second position in which the axis L2 of the coupling member is inclined with  
23 respect to the position of the axis L2 when the coupling member is in the first  
24 position.

25 164. Defendants' acts complained of herein are damaging and will  
26 continue to cause irreparable injury and damage to Canon for which there is no  
27 adequate remedy at law. Canon is therefore entitled to preliminary and permanent  
28 injunctions restraining and enjoining Defendants from infringing the claims of the

1 '582 patent.

2 165. By reason of Defendants' infringing activities, Canon has suffered,  
3 and will continue to suffer, substantial damages in an amount to be determined at  
4 trial.

5 **Fourth Cause of Action: Infringement of U.S. Patent No. 10,712,709**

6 166. Canon repeats and incorporates by reference the allegations of  
7 paragraphs 1-34 above, as though set forth here in their entirety.

8 167. Defendants have directly infringed and are directly infringing the '709  
9 patent by making, using, selling, and/or offering to sell in the United States and/or  
10 importing into the United States toner cartridges embodying the invention defined  
11 by one or more claims of the '709 patent, including without limitation the Accused  
12 Products, without authority or license of Canon. More particularly, Defendants'  
13 manufacture, use, sale, and/or offer for sale in the United States and/or importation  
14 into the United States of at least the Accused Products infringes at least claims 1-9,  
15 11-13, 22-32, 34-43, 45, and 46 of the '709 patent.

16 168. Defendants also are indirectly infringing the '709 patent at least by  
17 virtue of their inducement of direct infringement of that patent by customers who  
18 use Defendants' Accused Products in at least the Canon and HP laser beam printers  
19 listed above. At the very latest, Defendants will be given notice of their  
20 infringement of the '709 patent upon being served with or otherwise receiving this  
21 Complaint. On information and belief, Defendants knowingly induce customers to  
22 use their Accused Products, including, for example, by promoting them for use in  
23 specific printers and/or providing customers with instructions for using them in  
24 those printers.

25 169. The following paragraphs 173-208 show how Defendants' model  
26 NHCE310A toner cartridge, which is an example of an Accused Product, infringes  
27 independent claims 1, 13, 24, and 36 of the '709 patent.

28 170. Upon information and belief, the exemplary model NHCE310A toner

1 cartridge shown herein is substantially the same as the other Accused Products in  
2 all relevant respects, and thus is representative of the Accused Products.

3 171. The Court has not yet construed the meaning of any claims or terms in  
4 the '709 patent. In providing these detailed allegations, Canon does not intend to  
5 convey or imply any particular claim construction or the precise scope of the  
6 claims. Canon's contentions regarding the construction of the claims will be  
7 provided in compliance with the case schedule, any applicable federal or local  
8 procedural rules, and/or any applicable orders.

9 172. Canon contends that each element of each asserted claim is literally  
10 present in the Accused Products. If as a result of the Court's constructions or other  
11 determinations one or more claim elements are not literally present, Canon  
12 contends that each such element is present under the doctrine of equivalents and  
13 reserves its right to provide more detailed doctrine of equivalents contentions after  
14 discovery, a claim construction order from the Court, or at another appropriate  
15 time.

16 **Infringement of the '709 Patent by the NHCE310A Toner Cartridge**

17 173. The NHCE310A toner cartridge infringes claim 1 of the '709 patent.

18 174. Claim 1 of the '709 patent recites: "An image forming apparatus  
19 cartridge comprising:

- 20 (a) a casing;
- 21 (b) developer contained within the casing;
- 22 (c) a developer roller having an axis L1, the developer roller being  
23 rotatably supported by the casing to permit rotation about the  
24 axis L1; and
- 25 (d) a coupling member having an axis L2 about which the coupling  
26 member is rotatable and a free end portion for receiving a  
27 rotational force,
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- (e) the free end portion including at least two projections that are positioned at least partly outside of the casing, each of the at least two projections being open to the axis L2 and having a slanted surface with respect to a plane perpendicular to the axis L2,
- (f) the coupling member being operatively connected to the developer roller in order to be capable of transmitting the rotational force to the developer roller,
- (g) wherein the coupling member is movable between (i) a first position in which the axis L2 of the coupling member is substantially parallel to and offset from the axis L1 of the developer roller such that the axis L2 does not pass through the developer roller, (ii) a second position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position, and (iii) a third position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position in a direction opposite to the direction the coupling member is inclined when in the second position.”

175. As shown in Figure 4-1 below, the NHCE310A toner cartridge is an image forming apparatus cartridge, also known as a toner cartridge.



Fig. 4-1

176. As shown in Figure 4-2 below, the toner cartridge has a casing, with developer contained within the casing.

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Fig. 4-2

177. As shown in Figure 4-3 below, the toner cartridge has a developing roller having an axis L1. The developing roller is rotatably supported by the casing to permit rotation about the axis L1.



Fig. 4-3

178. As shown in Figure 4-4 below, the toner cartridge has a coupling member.

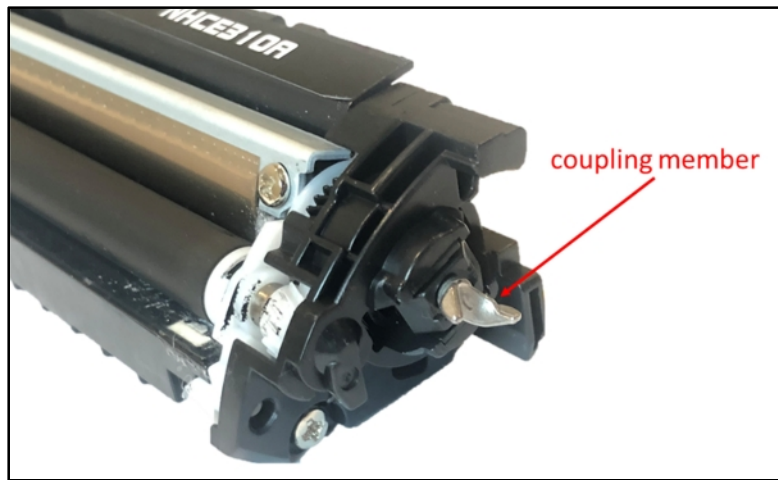


Fig. 4-4

179. As shown in Figure 4-5 below, the coupling member (shown removed from the cartridge) has an axis L2 about which the coupling member is rotatable and a free end portion for receiving a rotational force.

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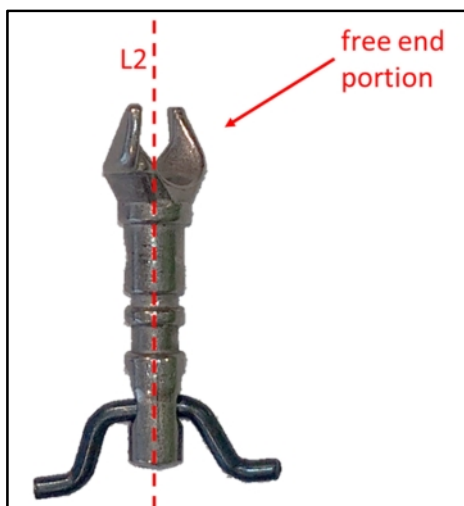


Fig. 4-5

180. As shown in Figures 4-6, 4-7, and 4-8 below, the free end portion includes two projections that are positioned at least partly outside of the casing (as shown in Figure 4-4 above). As also shown in these figures, each projection is open to the axis L2 and has a slanted surface with respect to a plane perpendicular to the axis L2. In an assembled cartridge (shown in Figures 4-1 and 4-4 above), the coupling member is operatively connected to the developing roller such that it can transmit the rotational force to the developer roller.

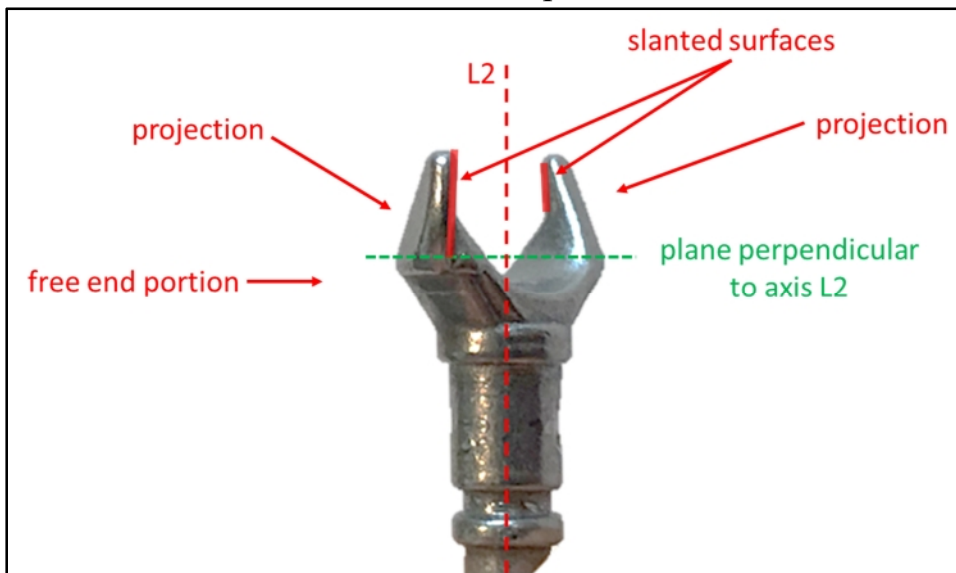


Fig. 4-6 (a slanted surface on each projection)

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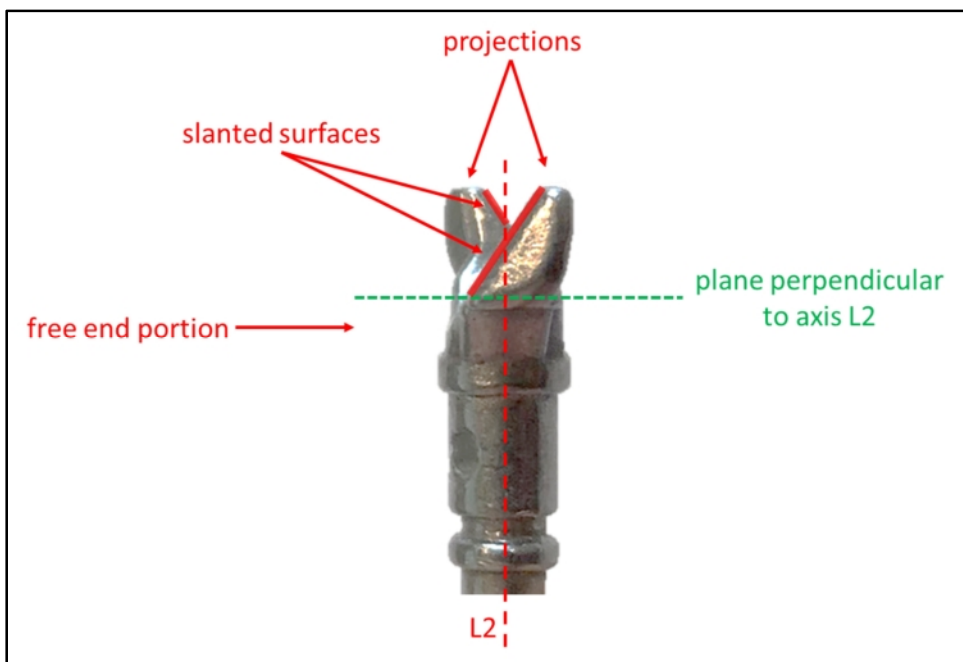


Fig. 4-7 (another slanted surface on each projection)

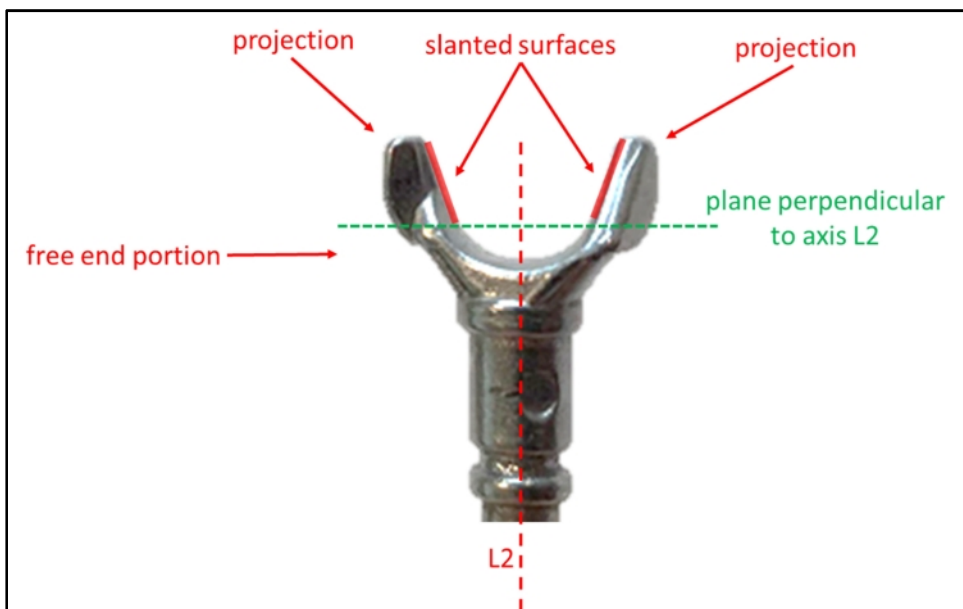


Fig. 4-8 (another slanted surface on each projection)

181. As shown in Figure 4-9 below, the coupling member is movable between: (i) a first position in which the axis L2 of the coupling member is substantially parallel to and offset from the axis L1 of the developer roller such that the axis L2 does not pass through the developer roller; (ii) a second position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position; and (iii) a third

1 position in which the axis L2 of the coupling member is inclined with respect to  
 2 the position of the axis L2 when the coupling member is in the first position in a  
 3 direction opposite to the direction the coupling member is inclined when in the  
 4 second position.

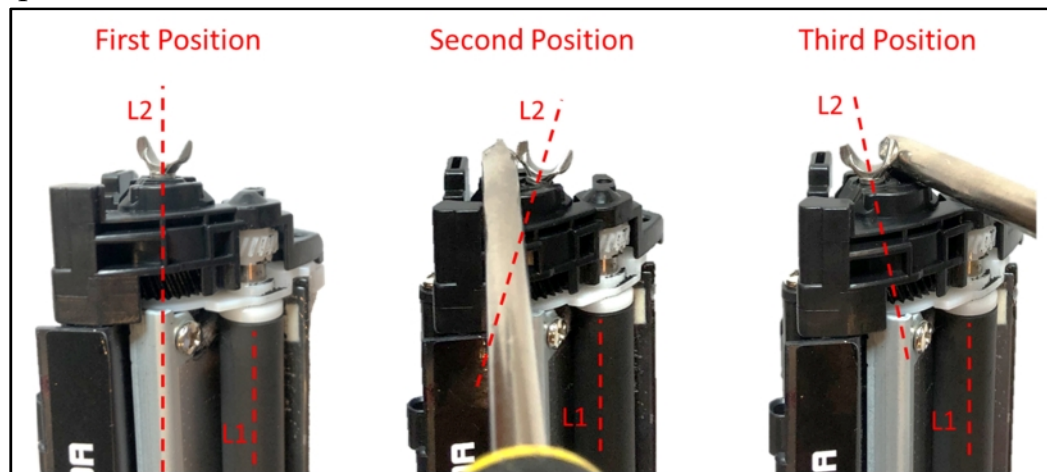


Fig. 4-9

182. The NHCE310A toner cartridge also infringes claim 13 of the '709 patent.

183. Claim 13 of the '709 patent recites "An image forming apparatus cartridge comprising:

- (a) a casing;
- (b) developer contained within the casing;
- (c) a developer roller having an axis L1, the developer roller being rotatably supported by the casing to permit rotation about the axis L1; and
- (d) a coupling member having an axis L2 about which the coupling member is rotatable and a free end portion for receiving a rotational force,
- (e) the free end portion including at least two projections that are positioned at least partly outside of the casing, each of the at least two projections being open to the axis L2 and having a

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- 1 slanted surface with respect to a plane perpendicular to the axis
- 2 L2,
- 3 (f) the coupling member being operatively connected to the
- 4 developer roller in order to be capable of transmitting the
- 5 rotational force to the developer roller,
- 6 (g) wherein the coupling member is movable between (i) a first
- 7 position in which the axis L2 of the coupling member is
- 8 substantially parallel to and offset from the axis L1 of the
- 9 developer roller such that the axis L2 does not pass through the
- 10 developer roller and (ii) a second position in which the axis L2
- 11 of the coupling member is inclined with respect to the position
- 12 of the axis L2 when the coupling member is in the first
- 13 position.”

14 184. As shown in Figure 4-1 above, the NHCE310A toner cartridge is an  
15 image forming apparatus cartridge, also known as a toner cartridge.

16 185. As shown in Figure 4-2 above, the toner cartridge has a casing, with  
17 developer contained within the casing.

18 186. As shown in Figure 4-3 above, the toner cartridge has a developing  
19 roller having an axis L1. The developing roller is rotatably supported by the casing  
20 to permit rotation about the axis L1.

21 187. As shown in Figure 4-4 above, the toner cartridge has a coupling  
22 member.

23 188. As shown in Figure 4-5 above, the coupling member (shown removed  
24 from the cartridge) has an axis L2 about which the coupling member is rotatable  
25 and a free end portion for receiving a rotational force.

26 189. As shown in Figures 4-6, 4-7, and 4-8 above, the free end portion  
27 includes two projections that are positioned at least partly outside of the casing (as  
28 shown in Figure 4-4 above). As also shown in these figures, each projection is

1 open to the axis L2 and has a slanted surface with respect to a plane perpendicular  
2 to the axis L2. In an assembled cartridge (shown in Figures 4-1 and 4-4 above),  
3 the coupling member is operatively connected to the developing roller such that it  
4 can transmit the rotational force to the developer roller.

5 190. As shown in Figure 4-9 above, the coupling member is movable  
6 between: (i) a first position in which the axis L2 of the coupling member is  
7 substantially parallel to and offset from the axis L1 of the developer roller such  
8 that the axis L2 does not pass through the developer roller; and (ii) a second  
9 position in which the axis L2 of the coupling member is inclined with respect to  
10 the position of the axis L2 when the coupling member is in the first position.

11 191. The NHCE310A toner cartridge also infringes claim 24 of the '709  
12 patent.

13 192. Claim 24 of the '709 patent recites "An image forming apparatus  
14 cartridge comprising:

- 15 (a) a casing;
- 16 (b) developer contained within the casing;
- 17 (c) a developer roller having an axis L1, the developer roller being  
18 rotatably supported by the casing to permit rotation about the  
19 axis L1; and
- 20 (d) a coupling member having an axis L2 about which the coupling  
21 member is rotatable and a free end portion for receiving a  
22 rotational force,
- 23 (e) the free end portion including at least one projection that is  
24 positioned at least partly outside of the casing, the at least one  
25 projection being open to the axis L2 and having a slanted  
26 surface with respect to a plane perpendicular to the axis L2,

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- 1 (f) the coupling member being operatively connected to the
- 2 developer roller in order to be capable of transmitting the
- 3 rotational force to the developer roller,
- 4 (g) wherein the coupling member is movable between (i) a first
- 5 position in which the axis L2 of the coupling member is
- 6 substantially parallel to and offset from the axis L1 of the
- 7 developer roller so that the axis L2 does not pass through the
- 8 developer roller, (ii) a second position in which the axis L2 of
- 9 the coupling member is inclined with respect to the position of
- 10 the axis L2 when the coupling member is in the first position,
- 11 and (iii) a third position in which the axis L2 of the coupling
- 12 member is inclined with respect to the position of the axis L2
- 13 when the coupling member is in the first position in a direction
- 14 opposite to the direction the coupling member is inclined when
- 15 in the second position.”

16 193. As shown in Figure 4-1 above, the NHCE310A toner cartridge is an  
17 image forming apparatus cartridge, also known as a toner cartridge.

18 194. As shown in Figure 4-2 above, the toner cartridge has a casing, with  
19 developer contained within the casing.

20 195. As shown in Figure 4-3 above, the toner cartridge has a developing  
21 roller having an axis L1. The developing roller is rotatably supported by the casing  
22 to permit rotation about the axis L1.

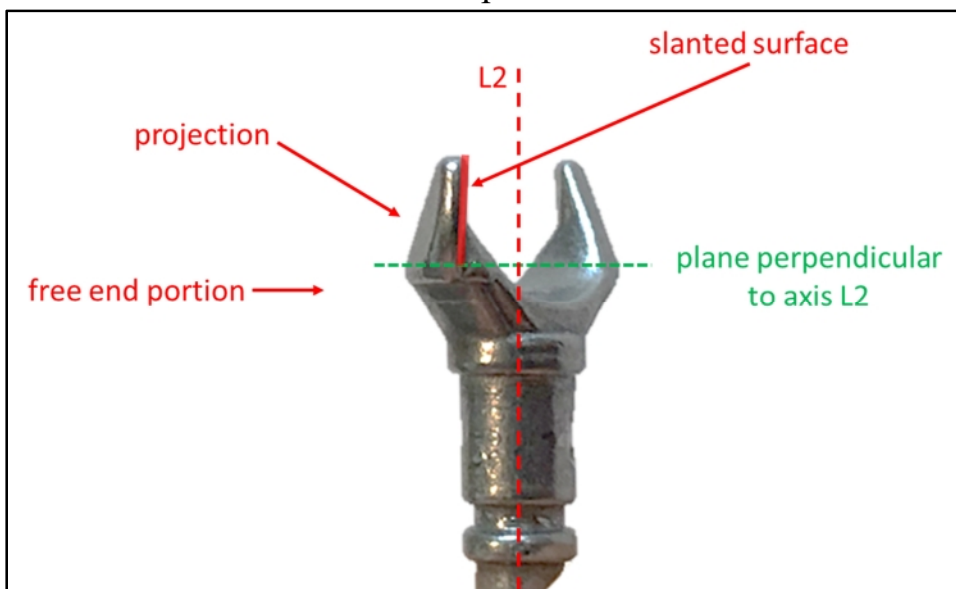
23 196. As shown in Figure 4-4 above, the toner cartridge has a coupling  
24 member.

25 197. As shown in Figure 4-5 above, the coupling member (shown removed  
26 from the cartridge) has an axis L2 about which the coupling member is rotatable  
27 and a free end portion for receiving a rotational force.

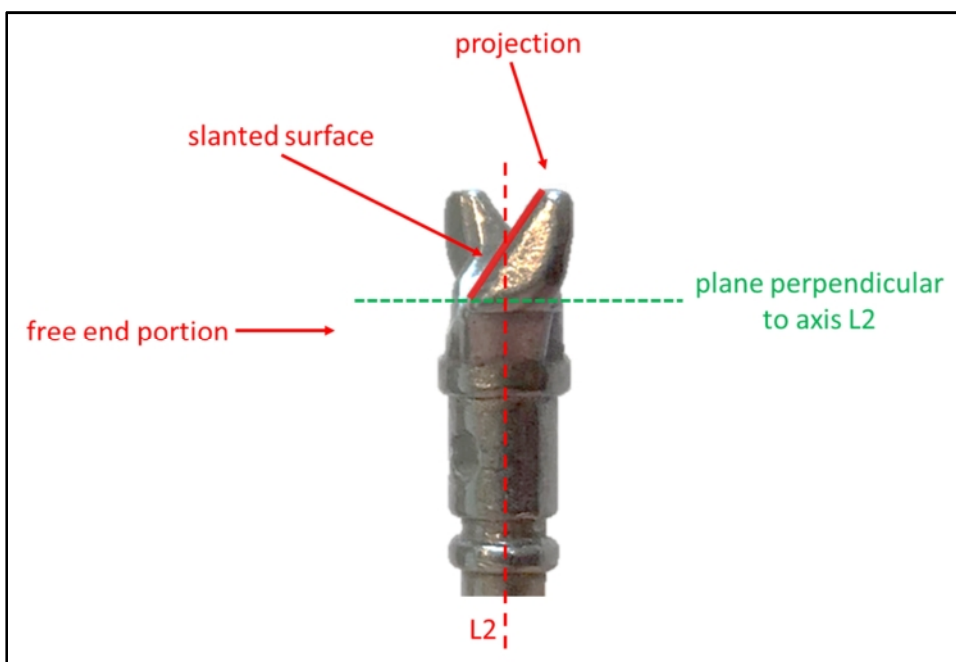
28 198. As shown in Figures 4-10, 4-11, and 4-12 below, the free end portion



1 includes a projection that is positioned at least partly outside of the casing (as  
2 shown in Figure 4-4 above). As also shown these figures, the projection is open to  
3 the axis L2 and has a slanted surface with respect to a plane perpendicular to the  
4 axis L2. In an assembled cartridge (shown in Figures 4-1 and 4-4 above), the  
5 coupling member is operatively connected to the developing roller such that it can  
6 transmit the rotational force to the developer roller.



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16 Fig. 4-10 (a slanted surface on a projection)



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28 Fig. 4-11 (another slanted surface on the projection)

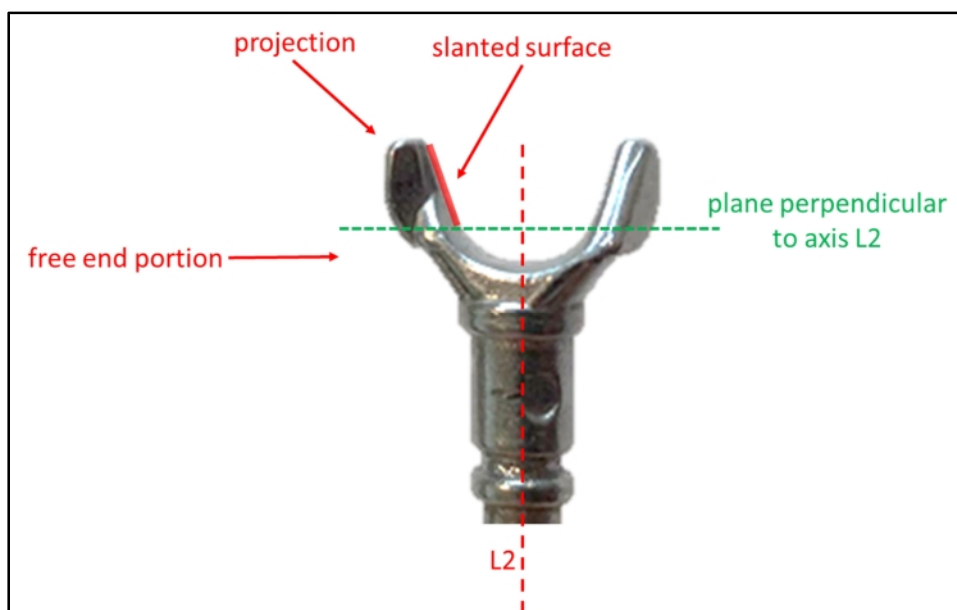


Fig. 4-12 (another slanted surface on the projection)

199. As shown in Figure 4-9 above, the coupling member is movable between: (i) a first position in which the axis L2 of the coupling member is substantially parallel to and offset from the axis L1 of the developer roller such that the axis L2 does not pass through the developer roller; (ii) a second position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position; and (iii) a third position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position in a direction opposite to the direction the coupling member is inclined when in the second position.

200. The NHCE310A toner cartridge also infringes claim 36 of the '709 patent.

201. Claim 36 of the '709 patent recites "An image forming apparatus cartridge comprising:

- (a) a casing;
- (b) developer contained within the casing;

- 1 (c) a developer roller having an axis L1, the developer roller being  
2 rotatably supported by the casing to permit rotation about the  
3 axis L1; and
- 4 (d) a coupling member having an axis L2 about which the coupling  
5 member is rotatable and a free end portion for receiving a  
6 rotational force,
- 7 (e) the free end portion including at least one projection that is  
8 positioned at least partly outside of the casing, the at least one  
9 projection being open to the axis L2 and having a slanted  
10 surface with respect to a plane perpendicular to the axis L2,
- 11 (f) the coupling member being operatively connected to the  
12 developer roller in order to be capable of transmitting the  
13 rotational force to the developer roller,
- 14 (g) wherein the coupling member is movable between (i) a first  
15 position in which the axis L2 of the coupling member is  
16 substantially parallel to and offset from the axis L1 of the  
17 developer roller so that the axis L2 does not pass through the  
18 developer roller and (ii) a second position in which the axis L2  
19 of the coupling member is inclined with respect to the position  
20 of the axis L2 when the coupling member is in the first  
21 position.”

22 202. As shown in Figure 4-1 above, the NHCE310A toner cartridge is an  
23 image forming apparatus cartridge, also known as a toner cartridge.

24 203. As shown in Figure 4-2 above, the toner cartridge has a casing, with  
25 developer contained within the casing.

26 204. As shown in Figure 4-3 above, the toner cartridge has a developing  
27 roller having an axis L1. The developing roller is rotatably supported by the casing  
28 to permit rotation about the axis L1.

1           205. As shown in Figure 4-4 above, the toner cartridge has a coupling  
2 member.

3           206. As shown in Figure 4-5 above, the coupling member (shown removed  
4 from the cartridge) has an axis L2 about which the coupling member is rotatable  
5 and a free end portion for receiving a rotational force.

6           207. As shown in Figures 4-10, 4-11, and 4-12 above, the free end portion  
7 includes a projection that is positioned at least partly outside of the casing (as  
8 shown in Figure 4-4 above). As also shown in these figures, the projection is open  
9 to the axis L2 and has a slanted surface with respect to a plane perpendicular to the  
10 axis L2. In an assembled cartridge (shown in Figures 4-1 and 4-4 above), the  
11 coupling member is operatively connected to the developing roller such that it can  
12 transmit the rotational force to the developer roller.

13           208. As shown in Figure 4-9 above, the coupling member is movable  
14 between: (i) a first position in which the axis L2 of the coupling member is  
15 substantially parallel to and offset from the axis L1 of the developer roller such  
16 that the axis L2 does not pass through the developer roller; and (ii) a second  
17 position in which the axis L2 of the coupling member is inclined with respect to  
18 the position of the axis L2 when the coupling member is in the first position.

19           209. Defendants' acts complained of herein are damaging and will  
20 continue to cause irreparable injury and damage to Canon for which there is no  
21 adequate remedy at law. Canon is therefore entitled to preliminary and permanent  
22 injunctions restraining and enjoining Defendants from infringing the claims of the  
23 '709 patent.

24           210. By reason of Defendants' infringing activities, Canon has suffered,  
25 and will continue to suffer, substantial damages in an amount to be determined at  
26 trial.

27           **Fifth Cause of Action: Infringement of U.S. Patent No. 10, 712,710**

28           211. Canon repeats and incorporates by reference the allegations of

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1 paragraphs 1-34 above, as though set forth here in their entirety.

2 212. Defendants have directly infringed and are directly infringing the '710  
3 patent by making, using, selling, and/or offering to sell in the United States and/or  
4 importing into the United States toner cartridges embodying the invention defined  
5 by one or more claims of the '710 patent, including without limitation the Accused  
6 Products, without authority or license of Canon. More particularly, Defendants'  
7 manufacture, use, sale, and/or offer for sale in the United States and/or importation  
8 into the United States of at least the Accused Products infringes at least claims 1-8,  
9 10-18, 20-29, 31-39, 41, and 42 of the '710 patent.

10 213. Defendants also are indirectly infringing the '710 patent at least by  
11 virtue of their inducement of direct infringement of that patent by customers who  
12 use Defendants' Accused Products in at least the Canon and HP laser beam printers  
13 listed above. At the very latest, Defendants will be given notice of their  
14 infringement of the '710 patent upon being served with or otherwise receiving this  
15 Complaint. On information and belief, Defendants knowingly induce customers to  
16 use their Accused Products, including, for example, by promoting them for use in  
17 specific printers and/or providing customers with instructions for using them in  
18 those printers.

19 214. The following paragraphs 218-257 show how Defendants' model  
20 NHCE310A toner cartridge, which is an example of an Accused Product, infringes  
21 independent claims 1, 12, 22, and 33 of the '710 patent.

22 215. Upon information and belief, the exemplary model NHCE310A toner  
23 cartridge shown herein is substantially the same as the other Accused Products in  
24 all relevant respects, and thus is representative of the Accused Products.

25 216. The Court has not yet construed the meaning of any claims or terms in  
26 the '710 patent. In providing these detailed allegations, Canon does not intend to  
27 convey or imply any particular claim construction or the precise scope of the  
28 claims. Canon's contentions regarding the construction of the claims will be

1 provided in compliance with the case schedule, any applicable federal or local  
2 procedural rules, and/or any applicable orders.

3 217. Canon contends that each element of each asserted claim is literally  
4 present in the Accused Products. If as a result of the Court’s constructions or other  
5 determinations one or more claim elements are not literally present, Canon  
6 contends that each such element is present under the doctrine of equivalents and  
7 reserves its right to provide more detailed doctrine of equivalents contentions after  
8 discovery, a claim construction order from the Court, or at another appropriate  
9 time.

10 **Infringement of the ’710 Patent by the NHCE310A Toner Cartridge**

11 218. The NHCE310A toner cartridge infringes claim 1 of the ’710 patent.

12 219. Claim 1 of the ’710 patent recites: “An image forming apparatus  
13 cartridge comprising:

- 14 (a) a casing;
- 15 (b) developer contained within the casing;
- 16 (c) a developer roller having an axis L1, the developer roller being  
17 rotatably supported by the casing to permit rotation about the  
18 axis L1;
- 19 (d) a first gear operatively connected to the developer roller;
- 20 (e) a second gear in meshing engagement with the first gear; and
- 21 (f) a coupling member operatively connected to the second gear,
- 22 (g) the coupling member having an axis L2 about which the  
23 coupling member is rotatable and a free end portion for  
24 receiving a rotational force,
- 25 (h) the free end portion including at least two projections that are  
26 positioned at least partly outside of the casing, each of the at  
27 least two projections being open to the axis L2, and  
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- (i) the coupling member being operatively connected to the developer roller via the first and second gears in order to be capable of transmitting of transmitting the rotational force to the developer roller,
- (j) wherein the coupling member is movable between (i) a first position in which the axis L2 of the coupling member is substantially parallel to and offset from the axis L1 of the developer roller, (ii) a second position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position, and (iii) a third position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position in a direction opposite to the direction the coupling member is inclined when in the second position.”

220. As shown in Figure 5-1 below, the NHCE310A toner cartridge is an image forming apparatus cartridge, also known as a toner cartridge.



Fig. 5-1

221. As shown in Figure 5-2 below, the toner cartridge has a casing, with developer contained within the casing.

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Fig. 5-2

222. As shown in Figure 5-3 below, the toner cartridge has a developing roller having an axis L1. The developing roller is rotatably supported by the casing to permit rotation about the axis L1.



Fig. 5-3

223. As shown in Figures 5-4 and 5-5 below, the toner cartridge has a first gear operatively connected to the developer roller, a second gear in meshing engagement with the first gear, and a coupling member operatively connected to the second gear.

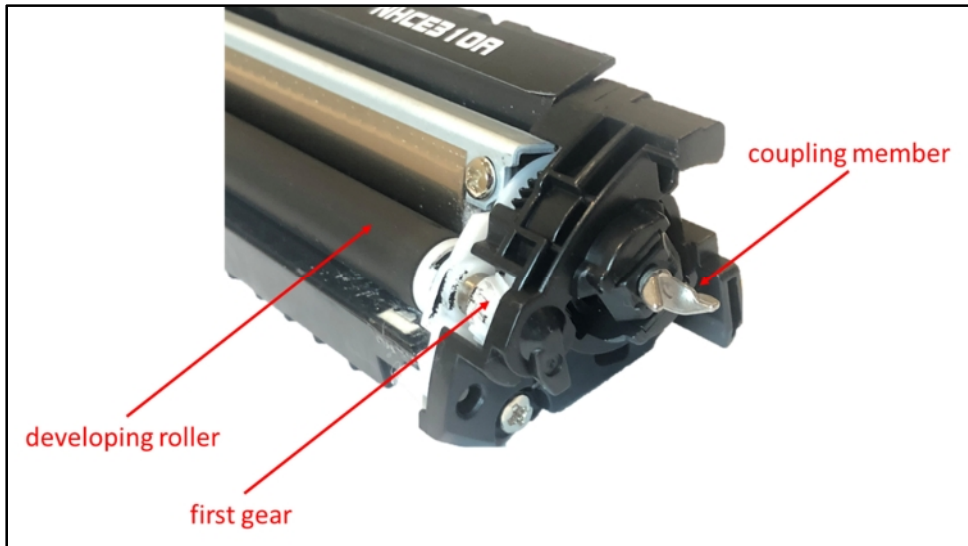


Fig. 5-4

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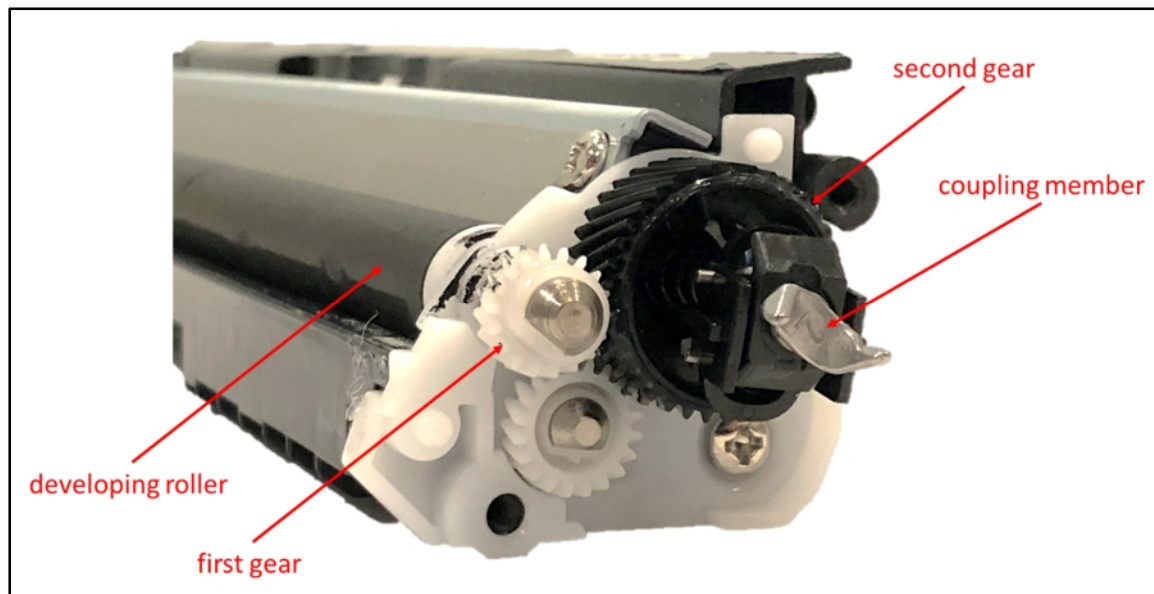


Fig. 5-5 (end cap removed)

224. As shown in Figure 5-6 below, the coupling member (shown removed from the cartridge) has an axis L2 about which the coupling member is rotatable and a free end portion for receiving a rotational force.

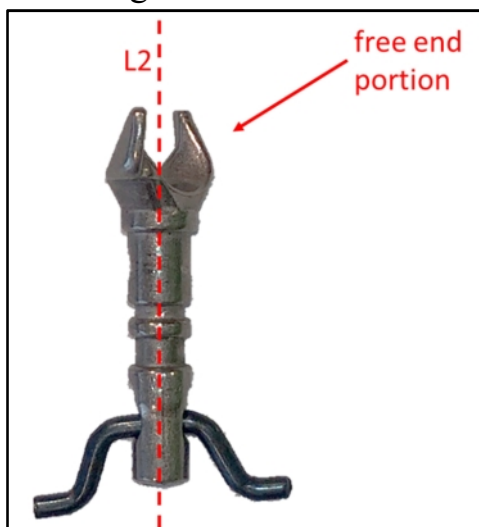


Fig. 5-6

225. As shown in Figure 5-7 below, the free end portion includes at least two projections that are open to the axis L2. As shown in Figure 5-4 above, the projections are positioned at least partly outside of the casing.

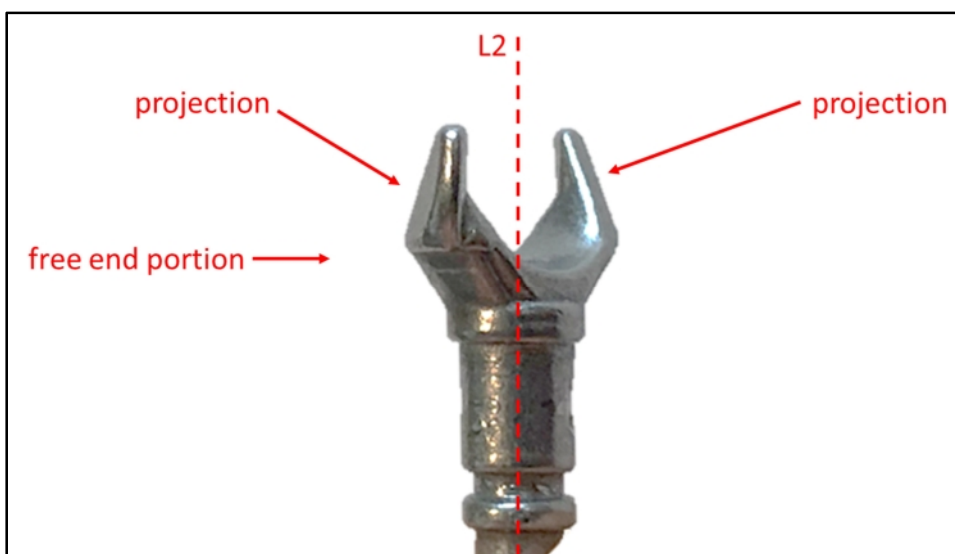


Fig. 5-7

226. As shown in Figures 5-4 and 5-5 above, the coupling member is operatively connected to the developer roller via the first and second gears in order to be capable of transmitting the rotational force to the developer roller.

227. As shown in Figure 5-8 below, the coupling member is movable between: (i) a first position in which the axis L2 of the coupling member is substantially parallel to and offset from the axis L1 of the developer roller; (ii) a second position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position; and (iii) a third position in which the axis L2 of the coupling member is inclined with respect to the position of the axis L2 when the coupling member is in the first position in a direction opposite to the direction the coupling member is inclined when in the second position.

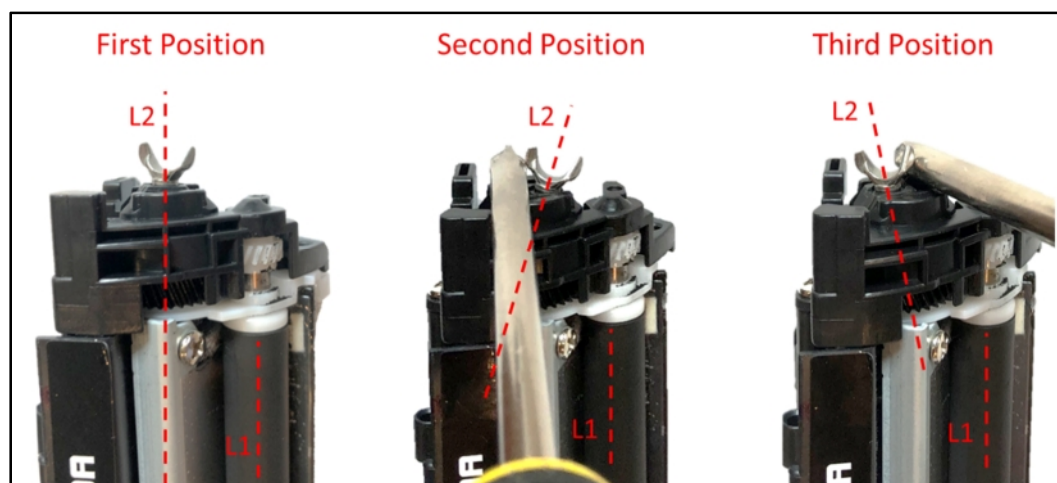


Fig. 5-8

228. The NHCE310A toner cartridge also infringes claim 12 of the '710 patent.

229. Claim 12 of the '710 patent recites "An image forming apparatus cartridge comprising:

- (a) a casing;
- (b) developer contained within the casing;
- (c) a developer roller having an axis L1, the developer roller being rotatably supported by the casing to permit rotation about the axis L1;
- (d) a first gear operatively connected to the developer roller;
- (e) a second gear in meshing engagement with the first gear; and
- (f) a coupling member operatively connected to the second gear,
- (g) the coupling member having an axis L2 about which the coupling member is rotatable and a free end portion for receiving a rotational force,
- (h) the free end portion including at least two projections that are positioned at least partly outside of the casing, each of the at least two projections being open to the axis L2, and
- (i) the coupling member being operatively connected to the developer roller via the first and second gears in order to be

1 capable of transmitting the rotational force to the developer  
2 roller,

3 (j) wherein the coupling member is movable between (i) a first  
4 position in which the axis L2 of the coupling member is  
5 substantially parallel to and offset from the axis L1 of the  
6 developer roller and (ii) a second position in which the axis L2  
7 of the coupling member is inclined with respect to the position  
8 of the axis L2 when the coupling member is in the first  
9 position.”

10 230. As shown in Figure 5-1 above, the NHCE310A toner cartridge is an  
11 image forming apparatus cartridge, also known as a toner cartridge.

12 231. As shown in Figure 5-2 above, the toner cartridge has a casing, with  
13 developer contained within the casing.

14 232. As shown in Figure 5-3 above, the toner cartridge has a developing  
15 roller having an axis L1. The developing roller is rotatably supported by the casing  
16 to permit rotation about the axis L1.

17 233. As shown in Figures 5-4 and 5-5 above, the toner cartridge has a first  
18 gear operatively connected to the developer roller, a second gear in meshing  
19 engagement with the first gear, and a coupling member operatively connected to  
20 the second gear.

21 234. As shown in Figure 5-6 above, the coupling member (shown removed  
22 from the cartridge) has an axis L2 about which the coupling member is rotatable  
23 and a free end portion for receiving a rotational force.

24 235. As shown in Figure 5-7 above, the free end portion includes at least  
25 two projections that are open to the axis L2. As shown in Figure 5-4 above, the  
26 projections are positioned at least partly outside of the casing.

27 236. As shown in Figures 5-4 and 5-5 above, the coupling member is  
28 operatively connected to the developer roller via the first and second gears in order

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1 to be capable of transmitting the rotational force to the developer roller.

2 237. As shown in Figure 5-8 above, the coupling member is movable  
3 between: (i) a first position in which the axis L2 of the coupling member is  
4 substantially parallel to and offset from the axis L1 of the developer roller; and (ii)  
5 a second position in which the axis L2 of the coupling member is inclined with  
6 respect to the position of the axis L2 when the coupling member is in the first  
7 position.

8 238. The NHCE310A toner cartridge also infringes claim 22 of the '710  
9 patent.

10 239. Claim 22 of the '710 patent recites "An image forming apparatus  
11 cartridge comprising:

- 12 (a) a casing;
- 13 (b) developer contained within the casing;
- 14 (c) a developer roller having an axis L1, the developer roller being  
15 rotatably supported by the casing to permit rotation about the  
16 axis L1;
- 17 (d) a first gear operatively connected to the developer roller; a  
18 second gear in meshing engagement with the first gear; and
- 19 (e) a coupling member operatively connected to the second gear,
- 20 (f) the coupling member having an axis L2 about which the  
21 coupling member is rotatable and a free end portion for  
22 receiving a rotational force,
- 23 (g) the free end portion including at least one projection that is  
24 positioned at least partly outside of the casing, the at least one  
25 projection being open to the axis L2, and
- 26 (h) the coupling member being operatively connected to the  
27 developer roller via the first and second gears in order to be  
28

1 capable of transmitting the rotational force to the developer  
2 roller,

- 3 (i) wherein the coupling member is movable between (i) a first  
4 position in which the axis L2 of the coupling member is  
5 substantially parallel to and offset from the axis L1 of the  
6 developer roller, (ii) a second position in which the axis L2 of  
7 the coupling member is inclined with respect to the position of  
8 the axis L2 when the coupling member is in the first position,  
9 and (iii) a third position in which the axis L2 of the coupling  
10 member is inclined with respect to the position of the axis L2  
11 when the coupling member is in the first position in a direction  
12 opposite to the direction the coupling member is inclined when  
13 in the second position.”

14 240. As shown in Figure 5-1 above, the NHCE310A toner cartridge is an  
15 image forming apparatus cartridge, also known as a toner cartridge.

16 241. As shown in Figure 5-2 above, the toner cartridge has a casing, with  
17 developer contained within the casing.

18 242. As shown in Figure 5-3 above, the toner cartridge has a developing  
19 roller having an axis L1. The developing roller is rotatably supported by the casing  
20 to permit rotation about the axis L1.

21 243. As shown in Figures 5-4 and 5-5 above, the toner cartridge has a first  
22 gear operatively connected to the developer roller, a second gear in meshing  
23 engagement with the first gear, and a coupling member operatively connected to  
24 the second gear.

25 244. As shown in Figure 5-6 above, the coupling member (shown removed  
26 from the cartridge) has an axis L2 about which the coupling member is rotatable  
27 and a free end portion for receiving a rotational force.

28 245. As shown in Figure 5-7 above, the free end portion includes at least

1 one projection that is open to the axis L2. As shown in Figure 5-4 above, the at  
2 least one projection is positioned at least partly outside of the casing.

3 246. As shown in Figures 5-4 and 5-5 above, the coupling member is  
4 operatively connected to the developer roller via the first and second gears in order  
5 to be capable of transmitting the rotational force to the developer roller.

6 247. As shown in Figure 5-8 above, the coupling member is movable  
7 between: (i) a first position in which the axis L2 of the coupling member is  
8 substantially parallel to and offset from the axis L1 of the developer roller; (ii) a  
9 second position in which the axis L2 of the coupling member is inclined with  
10 respect to the position of the axis L2 when the coupling member is in the first  
11 position; and (iii) a third position in which the axis L2 of the coupling member is  
12 inclined with respect to the position of the axis L2 when the coupling member is in  
13 the first position in a direction opposite to the direction the coupling member is  
14 inclined when in the second position.

15 248. The NHCE310A toner cartridge also infringes claim 33 of the '582  
16 patent.

17 249. Claim 33 of the '710 patent recites "An image forming apparatus  
18 cartridge comprising:

- 19 (a) a casing;
  - 20 (b) developer contained within the casing;
  - 21 (c) a developer roller having an axis L1, the developer roller being  
22 rotatably supported by the casing to permit rotation about the  
23 axis L1;
  - 24 (d) a first gear operatively connected to the developer roller;
  - 25 (e) a second gear in meshing engagement with the first gear; and
  - 26 (f) a coupling member operatively connected to the second gear,
- 27  
28

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- 1 (g) the coupling member having an axis L2 about which the
- 2 coupling member is rotatable and a free end portion for
- 3 receiving a rotational force,
- 4 (h) the free end portion including at least one projection that is
- 5 positioned at least partly outside of the casing, the at least one
- 6 projection being open to the axis L2, and
- 7 (i) the coupling member being operatively connected to the
- 8 developer roller via the first and second gears in order to be
- 9 capable of transmitting the rotational force to the developer
- 10 roller,
- 11 (j) wherein the coupling member is movable between (i) a first
- 12 position in which the axis L2 of the coupling member is
- 13 substantially parallel to and offset from the axis L1 of the
- 14 developer roller and (ii) a second position in which the axis L2
- 15 of the coupling member is inclined with respect to the position
- 16 of the axis L2 when the coupling member is in the first
- 17 position.”

18 250. As shown in Figure 5-1 above, the NHCE310A toner cartridge is an  
19 image forming apparatus cartridge, also known as a toner cartridge.

20 251. As shown in Figure 5-2 above, the toner cartridge has a casing, with  
21 developer contained within the casing.

22 252. As shown in Figure 5-3 above, the toner cartridge has a developing  
23 roller having an axis L1. The developing roller is rotatably supported by the casing  
24 to permit rotation about the axis L1.

25 253. As shown in Figures 5-4 and 5-5 above, the toner cartridge has a first  
26 gear operatively connected to the developer roller, a second gear in meshing  
27 engagement with the first gear, and a coupling member operatively connected to  
28 the second gear.





1 persons and organizations in active concert or participation with them, be  
2 preliminarily and permanently enjoined from further acts of infringement of the  
3 Asserted Patents pursuant to 35 U.S.C. § 283;

4 D. That Defendants be ordered to pay damages adequate to compensate  
5 Canon for Defendants’ infringement of the Asserted Patents pursuant to 35 U.S.C.  
6 § 284, including lost profits and/or a reasonable royalty, together with interest  
7 thereon;

8 G. That Defendants be ordered to pay all of Canon’s costs associated  
9 with this action; and

10 H. That Canon be granted such other and additional relief as the Court  
11 deems equitable, just, and proper.

12 **Jury Demand**

13 Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Canon  
14 demands a jury trial on all issues so triable.

15  
16 DATED: September 16, 2020 VENABLE LLP

17 By: /s/ Sarah S. Brooks  
18 Sarah S. Brooks  
19 Michael P. Sandonato (*Pro Hac to be Filed*)  
20 Edmund J. Haughey (*Pro Hac to be Filed*)  
21 Attorneys for Plaintiff Canon Inc.  
22  
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LOS ANGELES, CA 90067  
310-229-9900